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Board Report

File #: 2022-0487, **File Type:** Motion / Motion Response   **Agenda Number:** 33.

OPERATIONS, SAFETY, AND CUSTOMER EXPERIENCE COMMITTEE
MARCH 16, 2023

SUBJECT: USE OF PUBLIC SAFETY DATA MOTION RESPONSE

ACTION: APPROVE RECOMMENDATIONS

RECOMMENDATIONS
ADOPT:

A.   The Bias-Free Policing Policy (Attachment A); and

B.   The Public Safety Analytics Policy (Attachment B).

ISSUE

At its April 2022 meeting, the Board approved Motion 45 (Attachment C) by Directors Mitchell, Dupont-Walker, Hahn and Bonin directing staff to develop a Bias-Free Policing Policy and Public Safety Data Analytics Policy to avert racial profiling and bias in the deployment of Metro security and law enforcement services, consistent with the Metro Public Safety Mission statement that recognizes that each individual is entitled to a safe, dignified and human experience.

BACKGROUND

The customer code of conduct sets the foundation for delivering public safety services for our riders as it informs our customers about the behaviors we expect and will not tolerate to ensure a positive experience for everyone. It also provides guidance about the protocols for compliance

In Fall 2021, CEO Wiggins directed Metro's System Security & Law Enforcement (SSLE) to conduct a review of Code of Conduct citations, as part of her goal that Metro provides a safe, transparent, and equitable system for all. The review revealed that more than half of citations for "taking up more than one seat" and "riding with excess baggage" were issued to Black riders year-over-year from 2018-2020. Further, data from 2020 showed that African Americans received 53% of fare citations despite comprising 16% of Metro's ridership. While these outcomes do not rise to the level of formal discrimination, racial inequities and racial harm are made evident through the initial analysis of the data. In December 2021, the Metro Office of Civil Rights launched a Mystery Rider Fare Observation Program to independently review the fare compliance process. Further, in April 2022, the Board unanimously reaffirmed and declared that racism is a threat to public health and safety and that racism against Black people has reached crisis proportions that result in large disparities in life

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outcomes beyond the Metro system.

In February 2022, the SSLE department proposed creating the Analytics-Led Public Safety program as a part of the larger Reimagining Public Safety plan. The program would leverage data analytics to aid the review of ridership statistics, customer feedback surveys, security information, and homeless outreach data to help inform Metro's deployment of public safety resources to areas that need them the most. This raised concerns from community groups, racial justice advocacy organizations, and the Public Safety Advisory Committee (PSAC) that the proposal did not consider potential unintentional consequences and how Metro would mitigate against disproportionate impacts. Specifically, concerns were raised about predictive policing and the potential to utilize racially biased data, including citation data, to inform resource deployment that would only cause more racially biased outcomes. SSLE affirmed that data analytics is not the same as predictive policing. Data analytics is a method to understand the risks and issues impacting the system by leveraging Metro derived data. Specifically, data driven insights on risks and issues, that are not racially-based, would drive resource deployments, to include non-law enforcement alternatives.

In an effort to ensure that unconscious bias does not influence the Analytics-Led Public Safety Program, in April 2022, the Metro Board directed staff to develop a Bias-Free Policing Policy and Public Safety Data Analytics Policy. The policies, along with existing mandated training and oversight, affirm Metro's commitment to averting racial profiling and bias in the use of data and deployment of security resources.

DISCUSSION

As approved by the Board, the following are the mission and values statements for public safety on the Metro system:

Mission Statement: Metro safeguards the transit community by taking a holistic, equitable, and welcoming approach to public safety. Metro recognizes that each individual is entitled to a safe, dignified, and human experience.

Values Statements:
- Implement a Human-Centered Approach
- Emphasize Compassion and a Culture of Care
- Recognize Diversity
- Acknowledge Context
- Committed to Openness and Accountability

Bias-Free Policing Policy

Metro expressly prohibits all forms of biased policing. The Bias-Free Policing policy is essential to Metro's commitment to impartial and equitable treatment of all individuals, regardless of their personal characteristics. The policy establishes clear expectations and standards for fair and unbiased policing and reinforces the importance of treating all individuals with respect and dignity. This policy is crucial to effectively carry out Metro's safety mission, vision, and values.

Unbiased and equitable treatment is essential to ensure all Metro riders are treated in a fair, impartial, equitable, and objective manner and are not subjected to discrimination or prejudice based on personal demographics, such as their race, gender, religion, or socio-economic status. The policy directs that all contact with safety personnel will be based solely on the facts and circumstances of a situation, without being influenced by personal biases or prejudices when making decisions about safety deployment, to detain, cite or arrest.

The policy states unequivocally that Metro will:

> A. Dignify and respect the diversity and cultural differences of all people.
> B. Assure the highest standard of integrity and ethics among all agency personnel.
> C. Identify, prevent, and eliminate any instances of biased policing and racial profiling by agency personnel.
> D. Provide bias-free security services consistent with constitutional and statutory mandates.
> E. Prioritize the use of non-law enforcement response to calls for service when appropriate.
> F. Ensure any data or information obtained by Metro or associated contract services or law enforcement agencies regarding actual or perceived race, religion, color, ethnicity, national origin, age, gender, gender identity, gender expression, sexual orientation, disability, immigration, or employment status, English language fluency or homeless circumstance, is never used in a manner that supports bias or discrimination.
> G. Uphold the agency's commitment to protecting and serving people through transit services, safety, and non-law enforcement resources that promote and strengthen public trust and confidence in Metro and enhance the legitimacy of its policing practices.

The application portion of this policy focuses on ensuring that except in "suspect specific incidents," where acknowledgement, identification or reference to a suspect's specified characteristics is critical to the preservation of public safety, police and security officers are prohibited from considering actual or perceived race, religion, color, ethnicity, national origin, age, gender, gender identity, gender expression, sexual orientation, disability, immigration, or employment status, English language fluency or homeless circumstance in deciding to engage or detain a person. All contacts and activities shall be unbiased and based on legitimate, articulable facts, consistent with reasonable suspicion or probable cause standards as required by federal and state law. The policy defines key terms, outlines responsibilities associated with deploying fair and impartial treatment, sets compliance standards, reporting and training protocols, and plans to monitor performance and track key performance indicators.

Training is critical in ensuring compliance with the policy. Metro requires implicit bias training for all employees. In addition, the following training is mandatory for all Metro staff and contractors providing security resources on the system.

1. Bystander Intervention
2. Implicit (Unconscious) Bias for Transit Security
3. Safety/Security Training (Includes a primer on Unconscious Bias training)

In addition to the required training, safety and security personnel currently receive training on good practices of de-escalation, culture awareness, and Metro will work with local community-based organizations, and P.A.T.H to receive training on mental health and other social services. Whenever possible, Metro will integrate community members, from various backgrounds, into trainings to ensure they include the perspective of those whom Metro serves. Metro will also coordinate with PSAC to identify and advise on additional training curriculum opportunities.

Monitoring Performance
The Deputy Chief of Civil Rights will conduct an annual review of police and security reports, and the Safety Officer or designee will on a quarterly basis review the Transit Watch App, Customer Comment Analysis Tracking System (CCATS), and Customer Experience (CX) surveys to develop a report assessing feedback related to Metro anti-bias/anti-discrimination policies. Additionally, SSLE will at least annually assess customer's favorable impression of transit policing services including quality, fairness, helpfulness and satisfaction regarding racial profiling and/or bias.

To ensure transparency, specific KPIs will be tracked on a public facing dashboard that will include:

- Agency-wide annual compliance of all mandatory anti-bias related training (expectation of 100% compliance).
- Reports of complaints against law enforcement and security resources (expectation of year over year reduction).
- Use of force incidents (expectation of year over year reduction).
- Deployment of law enforcement security alternatives (expectation of year over year increase).
- Number of citations levied against marginalized communities (expectation of year over year reduction relative to population).

This policy will help to build a safer, more inclusive experience on the Metro system, ensuring all customers are confident that they will be treated fairly and impartially by security personnel. A failure to comply with this policy is viewed by Metro as counterproductive to building trust with and respect of riders and employees and will be considered serious misconduct.

Public Safety Analytics Policy

Public safety analytics is a tool for improving public safety outcomes. By leveraging data and technology, staff can better understand the nature and scope of public safety challenges and develop more effective strategies and interventions to address them.

Removing bias from public safety analytics is foundational because biased data can lead to biased decisions, which can harm certain groups in the community. The policy affirms that in deploying public safety resources, Metro considers information and data from a variety of platforms and sources but intends to safeguard against using such data and platforms in a discriminatory manner that is inconsistent with Metro policies and procedures.

Metro is committed to protecting the constitutional and civil rights of all people as outlined in Title VII

of the 1964 Civil Rights Act and the Americans with Disability Act (ADA). The purpose of this policy is to emphasize the agency's commitment to the collection and use of fair and bias-free public safety analytics and data and the fair and bias-free treatment of all people. This policy reaffirms Metro's pledge to bias-free practices and directs that the use of all data be done in a bias-free, non-discriminatory manner in its deployment of security and law enforcement services.

The policy's purpose is to remove bias from public safety analytics by ensuring that the data being used is of high quality - that is accurate, complete, consistent, reliable, and up to date - all of which determines how much a decision maker and stakeholders can trust the findings and implications. Equally important is ensuring the data has context, which limits assumptions and biases that could adversely impact the quality of the data. In addition, Metro will be trained to recognize and avoid biases in the analysis. The policy will ensure to the public that our analytics efforts are fair and equitable and that they promote public safety for all members of the community.

Metro is committed to utilizing data gathered in a bias-free, non-discriminatory manner in its deployment of security and law enforcement services, and to never utilize racial data in deploying resources.

The application portion of the policy addresses the use of analytics, the data sources that are anticipated to be utilized, the reports that will be generated from such data sources, the analytical tools that will be used, and how data will be gathered and assessed for quality and context. The policy also defines key terms, clarifies responsibilities for compliance and training, and establishes key performance indicators.

Regarding data sources, the policy states that Metro will focus on leveraging information from the following data sets, much of which is Metro derived:

- Calls for Service reports
- Vehicle maintenance requests
- Transit Watch App Incident reports
- Law Enforcement Service Requests (LESR)
- Incident reports
- Customer Comment Analysis Tracking System (CCATS)
- Customer Experience surveys
- Intrusion alarms at Metro facilities
- Trend reports from homeless outreach teams
- Justice Equity Need Index
- Justice Equity Services Index
- Everbridge alerts
- Frontline employee feedback (e.g., bus operators, custodians)

Metro will cite the instances and circumstances for using any external data sets.

Monitoring Performance and KPIs
To ensure policy compliance, Metro will take the following steps:

- SSLE will conduct quarterly reviews of security and analytic reports to confirm compliance with this policy. This includes reports which feature demographics, personal identifying information, or law enforcement or Metro-derived BOLOs.

- SSLE will ensure all agency personnel involved in public safety analytics maintain 100% annual compliance in attending and completing all related bias and discrimination training.

- SSLE will promptly address all complaints and will conduct a quarterly review of customer comments and complaints to ensure compliance with this policy.

- SSLE will continually evaluate KPIs to effectively measure success and assess impacts of the analytics program.

- KPI results will be published in a public facing dashboard.

As with the Bias-Free Policing policy, a failure to comply with this policy will be viewed by Metro as counterproductive to building the trust with and respect of customers and employees and will be considered to be an act of serious misconduct.

Collectively, these policies will work toward ensuring that all riders experience a transit system that is free of implicit/unconscious bias practices from security resources and law enforcement.

Community Outreach

SSLE staff worked with the first PSAC cohort to include a discussion of the motion in their workplan. In July 2022, staff presented to the PSAC's Non-Law Enforcement Alternatives Ad-hoc Subcommittee and discussed the intent to use various data points to enhance the implementation and effectiveness of its public safety resources. Metro staff reassured PSAC members that these objectives are not synonymous with predictive policing. Instead, Metro's safety programs place the customer at the forefront while recognizing that "feeling safe" is not a one-size-fits-all mentality. As a result, on August 17th, 2022, the PSAC voted on their recommendations regarding the Public Safety Analytics and Bias -Free Policing Policies (Attachment D).

In November 2022, SSLE engaged representatives from various Metro departments to discuss how both the Bias Free Policing and Public Safety Analytics policies were in line with Metro's commitment to equity and providing a system unencumbered by bias and discrimination. SSLE received feedback and recommendations which were incorporated into the policies. SSLE also reviewed State and federal guidelines to ensure the policies reflected fair and impartial treatment consistent with constitutional and statutory mandates.

In January 2023, Metro reached out to the following community organizations who had contacted the Board in April 2022 to present them with the drafted policies and seek their feedback:

- ACLU of Southern California
- Advancement Project California (Now Catalyst California)
- Community Coalition
- Community Power Collective
- Coalition for Humane Immigrant Rights (CHIRLA)
- Education Workers United, SEIU Local 99
- Esperanza Community Housing Corporation
- Investing in Place
- LA Black Worker Center
- LA Forward Action
- Labor Community Strategy Center/Bus Riders Union
- Los Angeles Walks
- People for Mobility Justice
- Strategic Actions for a Just Economy (SAJE)
- Stop LAPD Spying Coalition
- Women Organizing Resources Knowledge and Services (WORKS)

Of the aforementioned groups, People for Mobility Justice along with members of the current and former PSAC participated in SSLE hosted feedback sessions to address questions, elicit concerns, and incorporate feedback into the policies. Both policies received positive feedback with the participants recommending other data sources and validating that the key performance indicators were consistent in measuring the success of policy compliance. In addition to the feedback sessions, both policies were peer reviewed by UCLA's Center for Policing Equity.

The concerns identified by all groups during the peer review and feedback sessions are as follows:

- Remove language regarding community policing
- Ensuring Community Based Organizations (CBOs) and the PSAC contributed and had an opportunity to review training curriculum related to bias and de-escalation and add training on cultural awareness and mental health
- Providing clear conduits for the public and employees to report discrimination and bias
- Ensuring terminology is consistent throughout the policies
- Define retaliation
- Ensure the public facing dashboards are accessible to all and are easy to use

DETERMINATION OF SAFETY IMPACT

Both the Bias Free Policing and Public Safety Data Analytics policies are critical to supporting Metro's goal of operating a safe and secure system free of bias and discrimination. Incorporating these

policies strengthens the trust between Metro and the community Metro serves by establishing transparency and accountability for security resources.

FINANCIAL IMPACT
There is no financial impact to adopting both policies.

EQUITY PLATFORM

Approving these policies promotes public confidence that Metro is a safe and secure system that is free of bias and discrimination. Transparency and accountability for security and law enforcement resources are critical to establishing public trust and creating a culture of safety and inclusivity aboard the Metro system.

Community engagement played a vital role in the development of these policies. Metro staff recognize the criticality of earning public trust and actively sought feedback to address concerns regarding policing across the system, perceived biases of security and law enforcement resources, and the use of public safety analytics. Metro hosted several virtual feedback sessions and received peer review from UCLA's Center for Policing Equity. Incorporated feedback included clarifying terminology, validating key performance indicators, and ensuring the policies articulated transparency and accountability when violations occurred. In addition to the policies, feedback participants requested regular engagements with SSLE and the opportunity to have input on content related to public facing dashboards.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommendation supports Strategic Plan Goals #2.1: Deliver outstanding trip experiences for all users of the transportation system; Metro committed to improving security and #5.2: Provide responsive, accountable, and trustworthy governance within the Metro organization; Metro will exercise good public policy judgment.

NEXT STEPS

Upon board approval, SSLE will make these policy directives effective and implemented within FY23.

Metro security personnel will receive annual training relating to bias-free policing and proper use of data analytics.

Staff will also conduct quarterly compliance reviews of all security and analytic reports and review the Transit Watch App, Customer Comment Analysis Tracking System and Customer Experience surveys to assess adherence to Metro anti-bias/anti-discrimination policies. A public facing dashboard will also be created to track key performance indicators by the end of FY23 Q4.
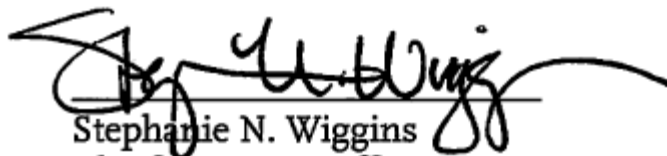
Staff will leverage PSAC to engage the community regarding data usage and receive feedback on potential biases and/or concerns.

ATTACHMENTS

Attachment A - Bias-Free Policing Policy
Attachment B - Public Safety Analytics Policy
Attachment C - Board Motion 45
Attachment D - PSAC Recommendations

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Stephanie N. Wiggins
Chief Executive Officer

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GENERAL MANAGEMENT
Bias-Free Policing Policy

(GEN 64)

POLICY STATEMENT

Metro is committed to providing transit services and enforcing the Code of Conduct in a professional nondiscriminatory, fair, and equitable manner. Discriminatory conduct on the basis of an individual's actual or perceived race, religion, color, ethnicity, national origin, age, gender, gender identity, gender expression, sexual orientation, disability, immigration, or employment status, English language fluency or homeless circumstance, is prohibited while performing any Metro activity. Metro has a zero-tolerance policy for any form of confirmed bias or discrimination, and expressly prohibits all forms of biased policing.

The intent of this policy is to avert racial profiling and discriminatory actions in the deployment of Metro security and public safety resources and build mutual trust and respect with the diverse groups and communities Metro provides service to. This policy will serve as a companion to the "*Public Safety Analytics Policy*", which ensures that any use of internal and external data sources is done in a manner that averts racial profiling and discrimination.

PURPOSE

Metro is committed to protecting the constitutional and civil rights of all people as outlined in Title VII of the 1964 Civil Rights Act and the Americans with Disability Act (ADA). The purpose of this policy is to emphasize this agency's commitment to the fair and bias-free handling of security resources and to the fair and bias-free treatment of all system patrons. All Metro security staff, contractors, and law enforcement partners supporting Metro will be expected to abide by this policy.

APPLICATION

This policy applies to all Metro employees and contractors. Contracted law enforcement entities will be provided the policy and be required to adhere to it.

_____   _____   _____
APPROVED: County Counsel or N/A   Department Head   ADOPTED: CEO

Effective Date: _____

Los Angeles County
Metropolitan Transportation Authority

GENERAL MANAGEMENT
Bias-Free Policing Policy

(GEN 64)

1.0 GENERAL

All individuals having contact with agency personnel shall be treated in a fair, impartial, bias-free, and objective manner, in accordance with the law, and without discrimination as defined in this policy.

It is the policy of Metro:

A. Dignify and respect the diversity and the cultural differences of all people.
B. Assure the highest standard of integrity and ethics among all agency personnel.
C. Identify, prevent, and eliminate any instances of biased policing and racial profiling by agency personnel.
D. Provide bias-free security services consistent with constitutional and statutory mandates.
E. Prioritize the use of non-law enforcement response to calls for service when appropriate.
F. Ensure any data or information obtained by Metro or associated contract services or law enforcement agencies regarding actual or perceived race, religion, color, ethnicity, national origin, age, gender, gender identity, gender expression, sexual orientation, disability, immigration, or employment status, English language fluency or homeless circumstance, is never used in a manner that supports bias or discrimination.
G. Uphold the agency's commitment to protecting and serving people through transit services, safety, and non-law enforcement resources that promote and strengthen public trust and confidence in Metro and enhance the legitimacy of its policing practices.

It is Metro's policy that except in "suspect specific incidents" where acknowledgment, identification, or reference to a suspect's specified characteristics is critical to the preservation of public safety, police and security officers are prohibited from considering actual or perceived race, religion, color, ethnicity, national origin, age, gender, gender identity, gender expression, sexual orientation, disability, immigration or employment status, English language fluency or homeless circumstance in deciding to engage or detain a person.

2.0 DEFINITION OF TERMS

Title VII - Title VII of the 1964 Civil Rights Act prohibits discrimination on the basis of race, color, or national origin by recipients of federal financial assistance.

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Biased Policing - Discrimination in the performance of law enforcement duties or delivery of police services by Metro or based on personal prejudices or partiality of agency personnel toward classes of people based on specified characteristics.

Americans with Disability Act (ADA): Federal law that prohibits discrimination on the basis of a disability. To be protected by the ADA, you must have a disability or relationship with an individual with a disability.

Fair and Bias-free Treatment - Conduct of agency personnel and contractors wherein all people are treated in the same manner under the same or similar circumstances irrespective of specific characteristics.

Discrimination - Any adverse act or failure to act based on race, color, national origin, religion, sex, age, physical or mental disability or condition, ancestry, marital status, sexual orientation, gender identity, gender expression, affiliation, or any other basis protected under applicable federal or state law.

Racial/Ethnic Profiling - Suspecting someone of having committed an offense based on race, ethnicity, or national origin rather than relevant information specific to the conduct in question.

Police Services - Actions and activities that may not directly include enforcement of the law, but that contribute to the overall well-being of the public. These include, but are not limited to, such tasks as public assistance to persons who may be lost, confused, or affected by mental or physical illness, as well as responding to medical emergencies, and providing lifesaving services, crime prevention, public information, and community engagement.

Protected Classes - For the purposes of this policy, real or perceived personal characteristics, including but not limited to race, color, national origin, religion, sex, medical conditions, disability, age, citizenship status, marital status, sexual orientation, gender identity, or political affiliation[1].

3.0 RESPONSIBILITIES

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[1] [1] This list is not exhaustive but is intended to identify the factors that are most likely to produce differential decisions on the part of law enforcement. The definition of protected classes is consistent with the following laws; Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), and the Rehabilitation Act of 1973.

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Bias-Free Policing Policy

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The Chief Executive Officer will ensure all agency personnel and contractors engaged in providing safety and security resources are operating in compliance with this policy and adhere to it.

3.1 Fair and Impartial Treatment

1. Biased policing is prohibited both in the enforcement of the law and the delivery of security and police services.

2. Agency personnel shall take equivalent enforcement actions and provide bias-free services to all people in the same or similar circumstances.

3.2 Compliance and Reporting

1. Agency personnel are encouraged to intervene at the time the biased policing or security incident occurs. Agency personnel who witness or who are aware of instances of biased policing are encouraged to report as early as possible.

2. Supervisors shall:
   a. Ensure that all agency personnel in their command are familiar with the content of this policy and shall be alert and respond when biased policing is occurring.
   b. Respond to violations of this policy with training, counseling, discipline, or other remedial intervention as deemed appropriate to the violation.
   c. Ensure that those who report instances of biased policing are not subject to retaliation[2].
   d. Employees concerned about leveraging their respective chains of command can contact the Office of Civil Rights at 213-418-3190 to report instances of biased policing and discrimination.

3. Information on biased-policing complaints and any additional relevant information shall be provided to the Chief Executive Officer or their designee in a manner most suitable for administrative review, problem assessment, and development of appropriate officer-level and/or agency-level corrective actions. At least quarterly, a summary of biased-policing complaints should be provided to the Chief Executive Officer or their designee.

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[2] The Supreme Court has defined retaliation as an intentional act in response to a protected action. Retaliation is a deliberate action used to send a clear message that complaining is unwelcome and risky. It is employed to instill fear in others who might consider making a complaint in the future. Those with cause for complaining are frequently among the most vulnerable in an institution. Once they complain, they are labeled "trouble-makers." Retaliation, and the fear of retaliation, becomes a potent weapon used to maintain the power structure within the institution.

Bias-Free Policing Policy (GEN 64)

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4. Metro will generate and maintain a public facing bias complaint dashboard to ensure transparency with the community regarding any allegations of the use of age, disability, ethnicity, gender, nationality, race, religion or sexual orientation as a basis for action by Metro security services..

5. Community members who are victims of unconscious bias, discrimination, or racial profiling by Metro staff, contractors, or contracted law enforcement services have several options to file a formal complaint.
    a. Complete the online Civil Rights Complaint form found at https://media.metro.net/about_us/title_vi/images/civil_rights_complaint_form.pdf
    b. Submit a complaint via the Transit Watch Application
    c. Contact Customer Relations via email at CustomerRelations@metro.net or call 213-922-6235 or 1-800-464-2111.

A failure to comply with this policy is counterproductive to building trust and respect with Metro customers and employees and is an act of serious misconduct and will result in discipline or termination. Any employee who becomes aware of biased policing or any other violation shall report it in accordance with established Metro procedures. Contract public safety employees shall report violations of this policy in accordance with the host agency and Metro procedures.

3.3 Training

Metro requires annual implicit bias training for all employees. In addition, the following represents mandatory training for all Metro staff and contractors providing security resources on the system.

1. Bystander Intervention (De-Escalation Training)
2. Implicit (Unconscious) Bias for Transit Security
3. Safety/Security Training (Includes a primer on Unconscious Bias training)

In addition to required training, safety, and security personnel will also receive training on good practices of de-escalation and culture awareness. Metro will work with local Community-Based Organizations to develop and deliver training on mental health and other social services. Whenever possible, Metro will integrate community members from a variety of backgrounds into trainings to ensure the training includes the perspective of those whom Metro serves. Metro

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Bias-Free Policing Policy

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will also coordinate with the Public Safety Advisory Committee (PSAC) to identify and vet training curriculum opportunities.

3.4 Monitoring Performance and Key Performance Indicators (KPI)

1. The Deputy Chief of Civil Rights will conduct an annual review of police and security reports.

2. On a quarterly basis, the Chief Safety Officer or designee will review the Transit Watch App, Customer Comment Analysis Tracking System (CCATS), and Customer Experience (CX) surveys to develop a report assessing feedback related to Metro anti-bias/anti-discrimination policies.

3. Through the annual or bi-annual safety and security survey of Metro patrons/riders, SSLE will assess and report on the following:
    o Percent Favorable Impression of Transit Policing Services
    o Service Rating - Service Quality
    o Service Rating – Fairness
    o Service Rating – Helpfulness
    o Increased rider satisfaction regarding racial profiling/bias

4. Metro will develop benchmarks for Key Performance Indicators, which will be tracked on a public-facing dashboard include:
    o Agency-wide annual compliance of all mandatory anti-bias related training.
    o Reports of complaints against law enforcement and security resources (expectation of year over year reduction).
    o Use of force incidents (expectation of year over year reduction).
    o Tracking the increased deployment of law enforcement/security alternatives (expectation of year over year increase).
    o Number of citations levied against marginalized communities (expectation of year over year reduction).

4.0 FLOWCHART

Not Applicable

5.0 REFERENCES

• Title VII of the 1964 Civil Rights Act
• CIV 5- LACMTA Civil Rights Policy
• CIV 4- Internal Complaint Process

**Los Angeles County
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- CIV 13- Title VI Equity Policies
- GEN 42- Customer Complaints
- IT 12- Security Incident Reporting and Response Policy
- GEN 63 Public Safety Analytics Policy

Los Angeles County
Metropolitan Transportation Authority

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Public Safety Analytics Policy

(GEN 63)

POLICY STATEMENT

Metro is committed to providing safe and equitable transit services to all patrons. Discriminatory conduct on the basis of an individual's actual or perceived race, religion, color, ethnicity, national origin, age, gender, gender identity, gender expression, sexual orientation, disability, immigration, or employment status, English language fluency or homeless circumstance, is prohibited while performing any Metro activity. Metro has a zero-tolerance policy for any form of confirmed bias or discrimination and ensures all safety and security activity is conducted without discrimination, racial profiling, and bias. In deploying resources, Metro takes into consideration information and data from a variety of platforms and sources, to include public feedback. Metro has drafted the Public Safety Analytics policy to ensure that any use of internal and internal data sources is done in a manner that averts racial profiling and discrimination and holds personnel accountable for actions inconsistent with Metro policies.

PURPOSE

Metro is committed to protecting the constitutional and civil rights of all people as outlined in Title VII of the 1964 Civil Rights Act and the Americans with Disability Act (ADA). The purpose of this policy is to emphasize the agency's commitment to the collection and use of fair and bias-free public safety analytics and data and the fair and bias-free treatment of all people. This policy reaffirms Metro's pledge to bias-free practices as declared in its *Bias-Free Policing Policy*. Metro will ensure the use of all data will be done in a bias-free, non-discriminatory manner in its deployment of security and law enforcement services.

APPLICATION

This policy applies to all Metro employees and contractors. Contracted law enforcement entities will be advised of the existence of this policy and required to adhere to it.

_____   _____   _____
APPROVED: County Counsel or N/A   Department Head   ADOPTED: CEO

                                                        Effective Date: _____

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GENERAL MANAGEMENT
Public Safety Analytics Policy

(GEN 63)

1.0 GENERAL

All individuals having contact with agency personnel shall be treated in a fair, impartial, bias-free, and objective manner, in accordance with the law, and without discrimination. Consistent with its commitment to bias-free policing, Metro pledges to utilize any data or information gathered in a manner that averts racial profiling.

In deploying resources, Metro considers information provided from a variety of platforms. These include, but are not limited to, bus and rail incident reports, the Customer Comment Analysis Tracking System (CCATS), CCTV, customer and employee surveys, dispatch calls for service, law enforcement crime statistics, intrusion alarms, social media, and the Transit Watch App. Examining data from these various platforms enables Metro to deploy its array of resources strategically. Examples of Metro resources include Transit Security Officers, non-law enforcement alternatives such as homeless outreach specialists, and Metro Transit Ambassadors.

2.0 DEFINITION OF TERMS

Title VII - Title VII of the 1964 Civil Rights Act prohibits discrimination on the basis of race, color, or national origin by recipients of federal financial assistance.

Americans with Disability Act (ADA) - Federal law that prohibits discrimination on the basis of disability. To be protected by the ADA, you must have a disability or relationship with an individual with a disability.

Fair and Bias-Free Treatment - Conduct of agency personnel and contractors wherein all people are treated in the same manner under the same or similar circumstances irrespective of specific characteristics.

Discrimination - Any adverse act or failure to act based on race, color, national origin, religion, sex, age, disability, ancestry, medical condition, marital status, sexual orientation, gender identity, gender expression, or any other basis protected under applicable federal or state law.

Racial/Ethnic Profiling - Suspecting someone of having committed an offense based on the individual's race, ethnicity, or national origin rather than relevant information specific to the individual or conduct in question.

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Protected Classes - Race, ethnic background, national origin, immigration status, gender, gender identity/expression, sexual orientation, religion, socioeconomic status, age, disability, or political affiliation[1].

3.0 IMPLEMENTATION

3.1 Use of Analytics

Analytics can assist in the proper deployment of emergency services, safety and security technology, and resources that improve the customer experience for all customers. Metro's use of analytics is intended to provide awareness of risks and issues that could potentially adversely impact Metro's bus and rail services and the viability, availability, and equitable deployment of Metro public safety and security resources. Analytics will be leveraged in a manner consistent with Metro's policies which promote the fair and impartial treatment of patrons, consistent with constitutional and statutory mandates.

3.2 Data Sources

Metro leverages information from a variety of sources and data sets to include:

- Calls for Service reports
- Vehicle maintenance requests
- Transit Watch App Incident reports
- Law Enforcement Service Requests (LESR)
- Incident reports
- Customer Comment Analysis Tracking System (CCATS)
- Customer Experience surveys
- Intrusion alarms at Metro facilities
- Trend reports from homeless outreach teams
- Justice Equity Need Index
- Justice Equity Services Index
- Everbridge alerts
- Feedback from frontline employees, e.g., bus operators and custodians

Metro will cite the instances and circumstances for the use of any external data sets outside of Metro holdings.

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[1] This list is not exhaustive but is intended to identify the factors that are most likely to produce differential decisions on the part of law enforcement. The definition of protected classes is consistent with the following laws; Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), and the Rehabilitation Act of 1973.

3.3 Use of Demographic Data

Metro will only leverage demographic data in a limited capacity to provide information necessary to provide information to the public and law enforcement on persons who present a direct threat to public safety (active shooter, terror suspect, robbery suspect). At no point will the use of demographic data be leveraged to inform or support the deployment of Metro's public safety resources. All data sources which utilize demographic data will be audited every 90 days by Metro's Chief Civil Rights Officer or designee to ensure compliance with Metro policies on discrimination and bias.

3.4 Use of External Reports

Metro's analytics program's use of external reports will be limited in scope and nature. Examples of such external reports include:

- U.S. Annual Crime Trends Report
- Incident reports from transit systems across the United States
- Incident reports from corporate partners
- Public BOLOs from law enforcement partners articulating safety and security threats to patrons and operators
- Information Awareness Bulletins from the Federal Bureau of Investigations (FBI) and the Department of Homeland Security (DHS)
- Joint Special Event Threat Assessments from FBI, DHS, and other state and local partners
- Reports generated by the Joint Regional Intelligence Center (JRIC)

All external reports will be documented and SSLE will ensure compliance with Metro policy.

3.5 Analytics Tools

Programs and tools used to support Metro in data analytics will include the following:

- ArcGIS
- Microsoft Power BI
- Microsoft Excel

An analytics tool policy will be drafted to ensure the usage of each program is consistent with this policy.

3.6 Report Types

Metro will leverage the aforementioned data to generate the following reports to provide awareness of safety and security issues across the system[2]: Metro will ensure all products are accessible to the public.

- Emerging trends reports
- Analysis of security incidents impacting rail and bus lines
- Analysis of issues impacting employee and rider safety
- Be On the Look Out (BOLO) reports on persons posing safety risks to operators and riders
- Vandalism trend reports

3.7 Data Gathering, Quality, and Context

Data serves as the foundation for all analytics products and its quality determines how much a decision maker and stakeholders can trust the findings and implications. Data quality is a measure of the condition of data based on factors such as accuracy, completeness, consistency, reliability, and whether it is up to date. All data utilized by the program will be assessed for data quality. Metro will operate from a zero-trust model in which all data will be verified for quality prior to incorporation into analysis, reports, and findings.

Equally as important as the gathering method and quality of data context. Data context is important as it limits assumptions and biases which could adversely impact the quality of the data. All data utilized within reports and products will be caveated with the following information:

- Data source
- Time range
- Data scope

4.0 RESPONSIBILITIES

4.1 Compliance

The Chief Executive Officer will ensure all agency personnel responsible for data collection, analysis, and deployment of Metro resources are familiar with the content of this policy and adhere to it.

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[2] This is not an exhaustive list but represents examples of Metro products.

GENERAL MANAGEMENT
Public Safety Analytics Policy

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Reports relating to violations of this policy shall be provided to the Chief Executive Officer or their designee in a manner most suitable for administrative review, problem assessment, and development of appropriate supervisor-level and/or executive-level corrective actions.

4.2 Training

Metro requires annual implicit bias training for all employees. In addition to required training, Metro will coordinate with the PSAC and Community-Based organizations to identify and vet training curriculum opportunities on topics such as cultural awareness. Additionally, for data analytic practitioners, training will be provided to address state and federal legislation on data privacy, data, and standards.

4.3 Monitoring Performance and Key Performance Indicators (KPI)

- SSLE will conduct quarterly reviews of security and analytic reports to confirm compliance with this policy. This includes reports that feature demographics, personal identifying information, or law enforcement or Metro-derived BOLOs.

- SSLE will ensure all agency personnel involved in public safety analytics maintain 100% annual compliance in attending and completing all related bias and discrimination training.

- SSLE will address all complaints and will conduct a quarterly review of customer comments and complaints to ensure compliance with this policy.

- SSLE will continually evaluate Key Performance Indicators (KPI) to effectively measure success and assess the impacts of the analytics program.

- KPI results will be published in a public facing dashboard.

5.0 FLOWCHART

Not Applicable

6.0 REFERENCES

- Title VII of the 1964 Civil Rights Act
- CIV 5- LACMTA Civil Rights Policy
- CIV 4- Internal Complaint Process
- CIV 13- Title VI Equity Policies
- GEN 42- Customer Complaints

GENERAL MANAGEMENT
Public Safety Analytics Policy

(GEN 63)

- IT 12- Security Incident Reporting and Response Policy
- GEN 64 Bias-Free Policing Policy

Metro

Los Angeles County
Metropolitan Transportation
Authority
One Gateway Plaza
3rd Floor Board Room
Los Angeles, CA

M Metro®

Board Report

File #: 2022-0286, **File Type:** Motion / Motion Response

Agenda Number: 45.

REGULAR BOARD MEETING
APRIL 28, 2022

Motion by:

DIRECTORS MITCHELL, DUPONT-WALKER, HAHN, AND BONIN,

Use of Public Safety Data Motion

Last fall, the Metro Chief Executive Officer initiated a review of Code of Conduct citation data. The review revealed that more than half of citations for "taking up more than one seat" and "riding with excess baggage" were issued to Black riders year-over-year from 2018-2020. Further, while making up 16% of riders (Fall 2019 Metro Customer Survey), Black riders received 53% of fare evasion citations administered in 2020. These statistics reveal that Code of Conduct provisions result in outcomes that are not equitable across the boundaries of protected classes and have disparate impacts primarily on unhoused African-American males.

As such, the CEO requested a comprehensive evaluation of the Code of Conduct as a substantive step towards an equitable and inclusive transit system. Code of Conduct enforcement was formally removed from Metro's law enforcement partners' Scope of Work in January 2022, and is now handled by Metro's Transit Security Officers.

In tandem, over the last two years, the Metro Board passed multiple motions calling for a change in the agency's public safety framework, amongst them an audit of use of force policies and the creation of a Public Safety Advisory Committee (PSAC).

CEO Wiggins has led this transformative change with less than a year at the helm and created a culture of transparency in decision making. Over the last year, Metro has directed an additional $3.6 million in the homeless shelter pilot, a doubling of funding for homeless outreach services, and at least $40 million to stand-up a transit ambassador program and other programs.

The Metro Board and leadership's commitment to racial justice means using racial justice-centered language and establishing racial justice-centered policies that acknowledge the harm of policing practices on Black and Brown riders. Earlier this year, Metro discussed its plans to use data to inform its new public safety framework. PSAC expressed concerns that the data analytics-led framework could be a step backwards, due to the characterization of the need to stop bad actors before they commit crimes. Racial justice advocacy organizations issued a letter to members of the Metro Board and leadership that argued using racially biased data, including citation data, to inform resource deployment will only cause more racially biased outcomes.

While the most recent transit safety and security report (April 2022) acknowledges community fears of predictive policing, and while Metro has committed to not using racial data to determine deployments, Metro and its Board must ensure unconscious bias does not influence public safety data analytics as it has in the past.

SUBJECT: USE OF PUBLIC SAFETY DATA MOTION

RECOMMENDATION

APPROVE Motion by Directors Mitchell, Dupont-Walker, Hahn, and Bonin that will:

A.   Reaffirm and declare that racism is a threat to public health and safety and that racism against Black people has reached crisis proportions that result in large disparities in life outcomes beyond the Metro system.

WE, FURTHER MOVE, that the Board direct the Chief Executive Officer to:

B.   Draft a policy for applying public safety analytics, including a data summary, to inform resource deployment that averts racial profiling for board consideration. The draft policy shall have robust community outreach and input from appropriate stakeholders such as racial justice advocacy organizations and the Public Safety Advisory Committee.

C.   Develop a Bias-Free Policing Policy which shall include:

1.   definitions for Bias-Free Policing and racial and identity profiling;

2.   key performance indicators to measure the effectiveness of the Bias-Free Policing Policy (including disparities in citations, uses of force, searches, arrests, and stops);

3.   clarification on circumstances in which characteristics of individuals may be considered;

4.   a system to encourage prompt completion of bias and inclusivity trainings with appropriate consequences for contractors and employees who fail to complete the trainings on schedule;

5.   a system for processing complaints regarding biased policing; and

6.   a plan to publicly host and analyze demographic data on a quarterly basis to track changes in arrest data over time for all contracted law enforcement partners.

D.   Report back to the Board on the above by August 2022.

Public Safety Analytics & Bias-Free Policing Policies Recommendations

About these Recommendations

The Public Safety Advisory Committee (PSAC) developed recommendations on Metro's Public Safety Analytics (PSA) and Bias-Free Policing (BFP) policies. These recommendations respond to Metro Board Motion #2022-0286. This motion directed Metro staff to develop the PSA and BFP policies to "ensure unconscious bias does not influence public safety data analytics as it has in the past" and "reaffirm and declare that racism is a threat to public health and safety that results in large disparities in life outcomes beyond the Metro system for Black people." Metro staff and PSAC members worked together to identify datasets, outcomes for key performance indicators, and outreach methods to inform the drafting of this policy.

Context

PSAC has previously made recommendations related to the use of data for the deployment of public safety resources. Those can be found here. These recommendations articulate several key points that are pertinent to PSAC's position on the development of the PSA and BFP policies and provide a framework for the recommendations in following sections.

1) "*Metro should not develop, adopt, or implement any system of predictive policing, or **use crime data and analytics to determine where to deploy law enforcement personnel**.*"
2) "*Metro should prioritize the timely adoption of the **robust ecosystem of non-law enforcement alternatives** to community safety developed by PSAC.*"
3) "*Metro should also use existing **equity-driven platforms** created by community-based organizations–and not police departments or law enforcement associations of any kind–to determine where to allocate non-law enforcement services that truly enhance community safety.*"

These three points - the exclusion of crime data usage to deploy law enforcement personnel, the prioritization of the deployment of non-law enforcement public safety alternatives, and the use of existing equity-driven data indexes to determine resource need - are central to the following recommendations.

Datasets

PSAC has reviewed [Metro's proposed data points](#) and recommends the following added datasets and data points as potential layers for the Public Safety Analytics policy.

> *Note: PSAC has expressly recommended against the use of crime statistics to deploy law enforcement resources. This data, when used to deploy police, will continue to exacerbate the currently disproportionate distribution of citations to Black and Hispanic riders on the Metro system.*

1. **External Platforms**
   a. [Justice Equity Need Index](#)
   b. [Justice Equity Services Index](#)

2. **Supporting Unhoused Riders**
   a. Data from Metro's homeless outreach teams
   b. Crime incident reports that involve an unhoused individual

3. **Operations & Maintenance Data**
   a. Vehicle maintenance requests
   b. Facility maintenance requests (track repairs, elevator/escalator repairs, lighting repairs)
      i. *Real-time requests from transit riders, vehicle operators, and Metro frontline staff should be prioritized if used in an index.*
   c. Station/stop lighting conditions
   d. Station/stop cleanliness conditions
      i. *Real-time requests from transit riders, vehicle operators, and Metro frontline staff should be prioritized if used in an index.*

4. **Internal Security Data**
   a. Vehicle operator calls for assistance
   b. Triggered intrusion alarms at Metro facilities
   c. Closed Circuit Television (CCTV) feeds

Outcomes for Key Performance Indicators

PSAC has articulated the following outcomes to support key performance indicators for the policy. Metro should use these proposed outcomes to measure the success of the program.

1. **Law Enforcement Responses and Performance**
   a. Reduced calls for law enforcement
   b. Reduced overall citations and arrests
   c. Reduced use of force incidents
   d. Increased number of de-escalated incidents
   e. Reduced number of complaints against law enforcement
   f. Reduced reports of law enforcement misconduct
   g. Reduced citations to Black Metro riders (*reduction should be based on overall percentage share of citations by racial group, not just cumulative citations*)
   h. Reduced citations to Hispanic Metro riders (*reduction should be based on overall percentage share of citations by racial group, not just cumulative citations*)

2. **Non-Law Enforcement Responses and Connections**
    a. Increased deployment for mental health outreach team
    b. Increased deployment of homeless outreach team

3. **Rider Satisfaction**
    a. Increased rider satisfaction regarding racial profiling/bias

Outreach

The committee identified the following groups and methods for outreach on the PSA and BFP policies. The *Key Constituencies* section outlines the target populations Metro should engage and identifies specific groups or organizations who can provide input. The *Outreach Methods* identifies the ways that Metro can most effectively reach the communities who will be most affected by these policies.

KEY CONSTITUENCIES

1. **Youth & Seniors**
    a. Youth Justice Coalition
    b. Students who ride Metro, especially junior high and high school-age students
    c. Senior centers and organizations who represent the needs of seniors

2. **Transportation Justice Organizations**
    a. Bus Riders Union
    b. Alliance for Community Transit Los Angeles
    c. People for Mobility Justice

3. **Civil Rights Organizations**
    a. Members of the LGBTQ Community and associated advocacy organizations
        i. Organizations include APAIT, Trans Latin@ Coalition, Program for Torture Victims, Bienestar, Connie Norman Empowerment Center, Gender Justice Los Angeles, Invisible Men, In the Meantime Men, APLA, AMAAD
    b. People with disabilities - physical, intellectual, developmental - and associated advocacy organizations
    c. Black Lives Matters LA chapter
    d. American Civil Liberties Union of Southern California
    e. Community Coalition
    f. Organizations representing the needs of female identified or feminine of center people
    g. Organizations representing the needs of the unhoused community

4. **Metro Frontline Staff**
    a. Vehicle operators
    b. Janitorial and maintenance staff
    c. Transit ambassadors

5. **Civic Data Organizations**
    a. Civic tech organizations
        i. Organizations include Data + Donuts or Electronic Frontier Foundation

OUTREACH METHODS

Prioritize In-Person Engagement: PSAC recommends in-person engagement as the most effective way to gather deeply personal information on public safety and meet Metro riders where they are. Engagement at major rail stations and bus stops will be particularly effective at ensuring Metro riders have the opportunity to provide feedback on these policies. Metro should also consider long-form engagement through individual interviews or focus groups. Additionally, there can be added benefits to incentivize participation in outreach. Providing compensation for participation in outreach activities is essential to value participant's time and bring in more participants. Offering amenities like food and childcare will help meet participant's basic human needs.

Bridging the digital divide: For many of the communities identified in the "Key Constituencies" section, there may be a lack of access to reliable and affordable internet. The committee recommends that Metro take steps to provide the necessary technology and internet access to these communities. As per the committee's Advisory Recommendations for Metro's Community Engagement on Public Safety Topics, this can be done by "*providing mobile hotspots in target areas, providing access to technologies like smartphones, laptops, or data plans, hosting technology skills training concurrent with other events, and hosting more in-person events within COVID protocols.*"

Accessibility: Any outreach efforts should be accessible in its language and event scheduling. Written, spoken, and recorded outreach materials should be in plain language and translated/interpreted into as many languages as possible. Engagement opportunities should provide a variety of access methods and adaptable scheduling. This can include offering different meeting access options simultaneously, for instance holding an in-person meeting that is also broadcasted on Zoom and a conference call line. Meeting times should also be offered after working hours or on weekends to offer participation opportunities outside of nine-to-five working hours.

PSAC also recommends that Metro utilizes its existing advisory committees to signal boost the outreach efforts for both the PSA and BFP policies.

Next Steps

At the time of writing, PSAC members made their recommendations based on the information in Motion #2022-0286. The committee has requested further clarification from Metro staff on how these policies will be implemented in the future, what kinds of resources they will deploy, and what the desired outcomes are. PSAC requests to hold further discussions with Metro staff once a draft of the policy is approved internally.

PSAC members will review this draft document at the July 20th General Committee meeting.

Use of Public Safety Data Motion Response

ROBERT GUMMER

DEPUTY EXECUTIVE OFFICER, ANALYTICS

Public Safety Mission Statement and Values

"Metro safeguards the transit community by taking a holistic, equitable and welcoming approach to public safety. Metro recognizes that each individual is entitled to a safe, dignified and human experience."

> Implementing a **human-centered approach**

> Emphasizing **compassion** and a **culture of care**

> Recognizing **diversity**

> Acknowledging **context**

> Committing to **openness** and **accountability**

Board adopted 12/2/21

Reimagined Public Safety Direction

Current Model

- Prescriptive and Fixed

- Inconsistent Rule Compliance

- Reactive Response

- Obscure Data & Outcomes

- Enforcement-Focused through a singular tactical response ("one size fits all")

- Siloed

New Model

- Data-Driven and Flexible

- Equitable Rule Compliance

- Proactive Response

- Transparent Outcomes

- Strategic Enforcement through analytics-led safety & security using a layered approach

- Collaborative

Motion 45 by Directors Mitchell, Dupont-Walker, Hahn, and Bonin Board Motion

The Board directed Metro to:

- Reaffirm and declare that racism is a threat to public health and safety and that racism against Black people has reached crisis proportions that result in large disparities in life outcomes beyond the Metro system

- Draft a Bias-Free Policing and Public Safety Analytics policies that averts racial profiling and bias in deployment of Metro security and law enforcement services.

Bias-Free Policing Policy

The Policy states that Metro will:
Provide fair and impartial police and security services consistent with constitutional and statutory mandates.
Prioritize the use of non-law enforcement response to calls for service when appropriate.
Assure the highest standard of integrity and ethics among all agency personnel.
Dignity and respect to the diversity and the cultural differences of all people.
Takes positive steps to identify, prevent, and eliminate any instances of biased policing and racial or gender profiling by agency personnel.
Ensure any data or information obtained, including regarding a person's race, ethnicity, sex, gender identity, sexual orientation, religion, language spoken, mental or physical disability, or socioeconomic level, is not utilized in a discriminatory manner.
Uphold the agency's commitment to protecting and serving people through community policing and problem solving, lawful and unbiased investigations and transit protection and safety, that promotes and strengthens public trust and confidence in Metro and enhances the legitimacy of its policing practices.

Public Safety Analytics Policy

The Policy states that Metro will:
Ensure the use of all data will be done in a bias-free, non-discriminatory manner in its deployment of security and law enforcement services.
Establish accountability for how internal and external data is utilized by Metro in support of security operations.
Establish a system for compliance checks to ensure the use of data is consistent with Metro's policies
Ensure demographic data is used only in limited use cases where the use of such data is deemed vital to help achieve public safety objectives.
Establish transparency and accountability through the creation of a public facing dashboard.

Public Outreach

To ensure the policies appropriately addressed concerns regarding policing across the system, perceived biases of security and law enforcement resources, and the use of public safety analytics, Metro actively conducted community outreach efforts and collaborative feedback sessions.

◦ PSAC – 1st and 2nd cohort

◦ Academia – Peer reviewed by UCLA's Center for Policing Equity

◦ Internal departments

◦ External organizations involved in racial justice and policing invited to comment

A scan across the US of transit agencies revealed that Metro policies are the first of their kind in the transit industry.

Next Steps

- SSLE will implement both policies and ensure all personnel are trained on the guidelines and KPIs.

- Establish a <u>public facing dashboard</u> by June 30, 2023, to:

  - Cover the development and use of analytic products in support of Metro services.

  - Cover any allegation involving Metro security services' response that uses age, disability, ethnicity, gender, nationality, race, religion, or sexual orientation as a basis for the action.

Thank You