RACIAL EQUITY AUDIT OF THE WPD

Review and Discussion by the Worcester
Human Rights Commission

DISCUSSION ROADMAP

- **Diversity, Equity and Inclusion**
  Data, Findings and Recommendations
  presented by Commissioner Bilotta

- **Recruitment, Hiring and Promotions**
  Data, Findings and Recommendations
  presented by Commissioner Hopkins

- **Policy and Practice Arrest Procedures**
  Data, Findings and Recommendations
  presented by Commissioner Feldman

- **Community Oriented Policing, Engagement and Practices**
  Data, Findings and Recommendations
  presented by Commissioner Creamer

- **Use of Force**
  Data, Findings and Recommendations
  presented by Commissioner O'Callahan

- **Complaints and Professional Standards**
  Data, Findings and Recommendations
  presented by Commissioner Shemitz

DEI FINDINGS AND RECOMMENDATIONS

INTERVIEW ANALYSIS

Diversity and recruitment

The feedback gathered from stakeholders underscored a pressing concern about the ==dearth of diversity in the WPD==. Community members, stakeholders, and city leadership detailed various staffing-related issues in WPD, including concerns surrounding DEI and recruitment.

When asked about what the WPD should improve on related to recruitment, interviewees said it is imperative that the department take a more concerted and effective approach to recruiting and promoting individuals from diverse backgrounds. The prevailing consensus was that for the WPD to fulfill its role as a community-oriented law enforcement agency, its composition should mirror the rich diversity of the community it serves, reinforcing the principles of inclusivity and representation that are fundamental to effective and equitable policing.

Internal equity and inclusivity

WPD staff, as well as a few local stakeholders, consistently voiced concerns about ==favoritism at the WPD==. During audit interviews, WPD members raised concerns that promotions and discipline are not administered equitably.

One common thread that emerged during the audit interviews was the desire of WPD staff to experience a greater sense of inclusion and representation in the discussion of departmental changes. Staff members believe that the department has ==limited avenues to collect essential feedback from officers== working in the field. WPD staff expressed a desire to create a culture of openness and responsiveness that is inclusive of its officers.

DEPARTMENT DATA ANALYSIS

- The audit team analyzed the WPD's staffing and demographic data from 2017 to 2021 and conducted a survey of WPD employees. A recent analysis of DEI in the WPD showed a limited level of diversity: since 2015, approximately 80 to 84 percent of personnel has been White. Although diversity has grown over the past five years, this increase has been very small.

- The data on gender representation in both the City of Worcester and the WPD also indicate a significant need to enhance the department's diversity and representation initiatives.

- In contrast, survey results of WPD employees' perceptions yielded generally positive sentiments regarding the department's treatment of employees, irrespective of race, gender, or ethnicity. Respondents largely agreed that the department has made efforts to diversify its workforce and create an inclusive environment.

- However, the survey also revealed concerns related to equity, particularly in the disciplinary process. A significant majority of respondents (over 60 percent) expressed the belief that this process prioritizes individuals who have the favor of the WPD or city leadership. This analysis highlights the need to continuously refine department processes that would help increase diversity.

RACE AND ETHNICITY

Figure 1. Race/ethnicity demographics of Worcester, MA, vs. the WPD, 2022
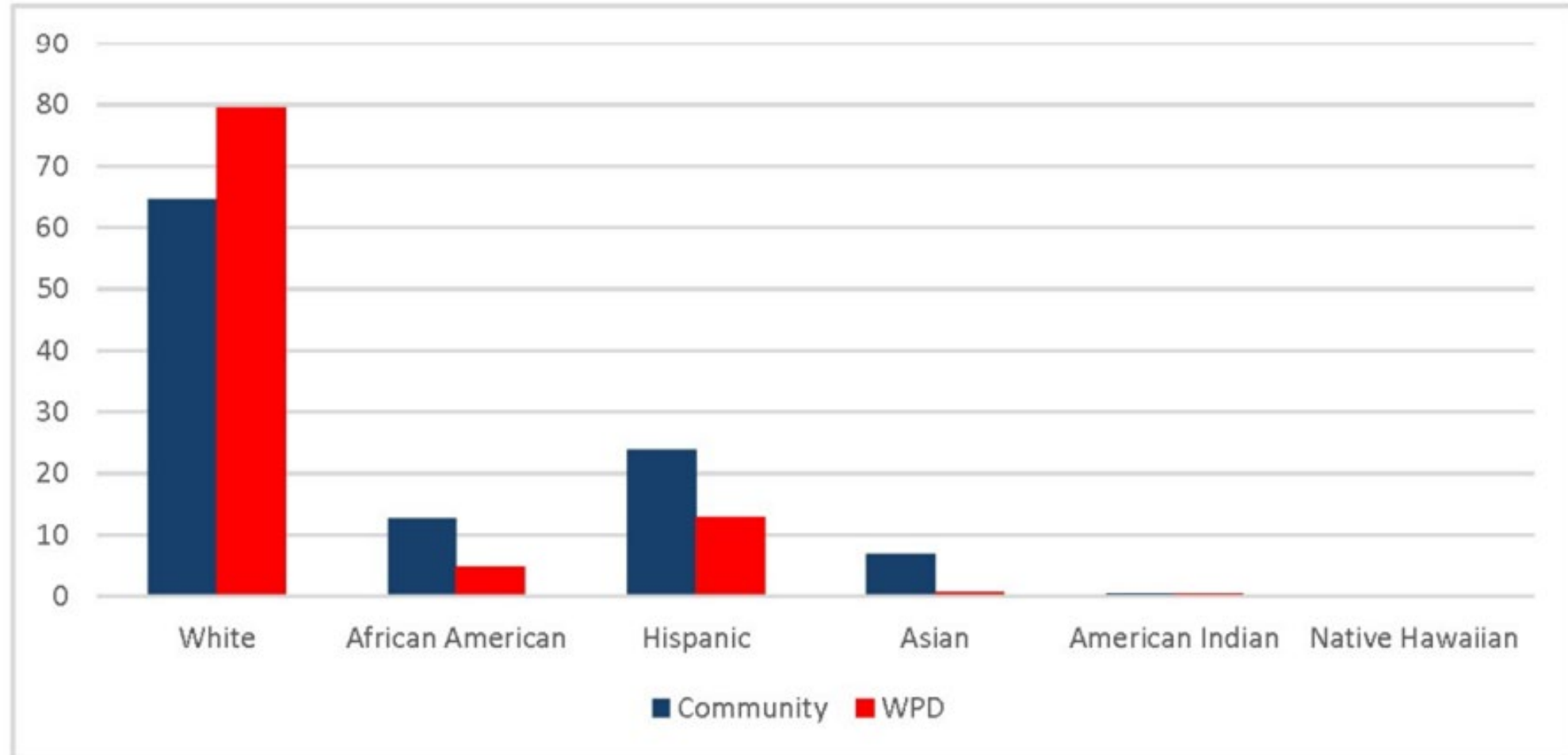
Source: Worcester Police Department.

Figure 2. The WPD's racial demographics, 2015–2022

Source: Worcester Police Department.

There has been a gradual increase in the representation of minority populations in the WPD. White WPD members have constituted approximately 80 percent or more of the WPD's staff since 2015. However, there has been a slow increase of minority populations in the police department.

Between 2016 and 2022, there has been a 0.6 percent increase in the number of Black officers, and since 2015, there has been a 3 percent increase in the number of Hispanic officers.

The gradual increase of minority populations in the police department speaks to WPD diversity recruitment initiatives , which has become more a priority in recent years.

SURVEY RESPONDENT DEMOGRAPHICS
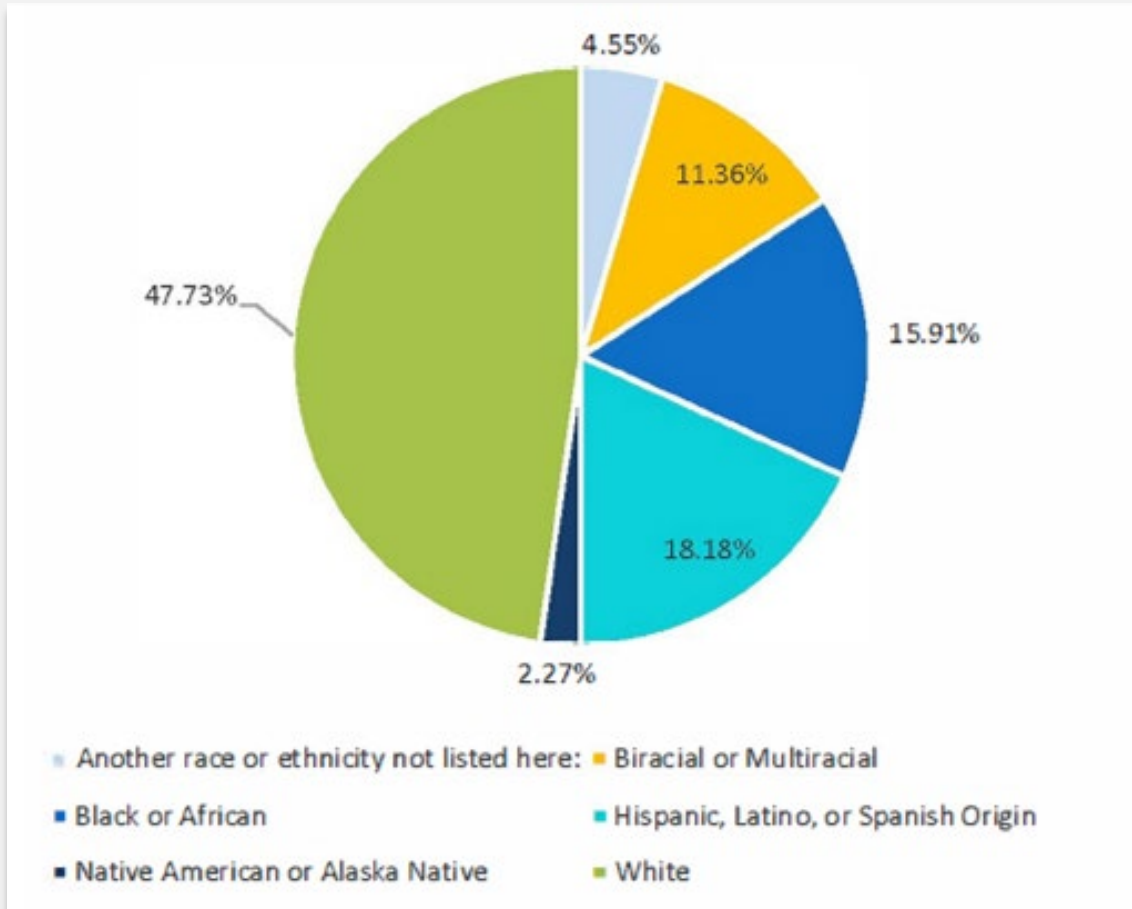
Figure C1. Race of WPD survey respondents
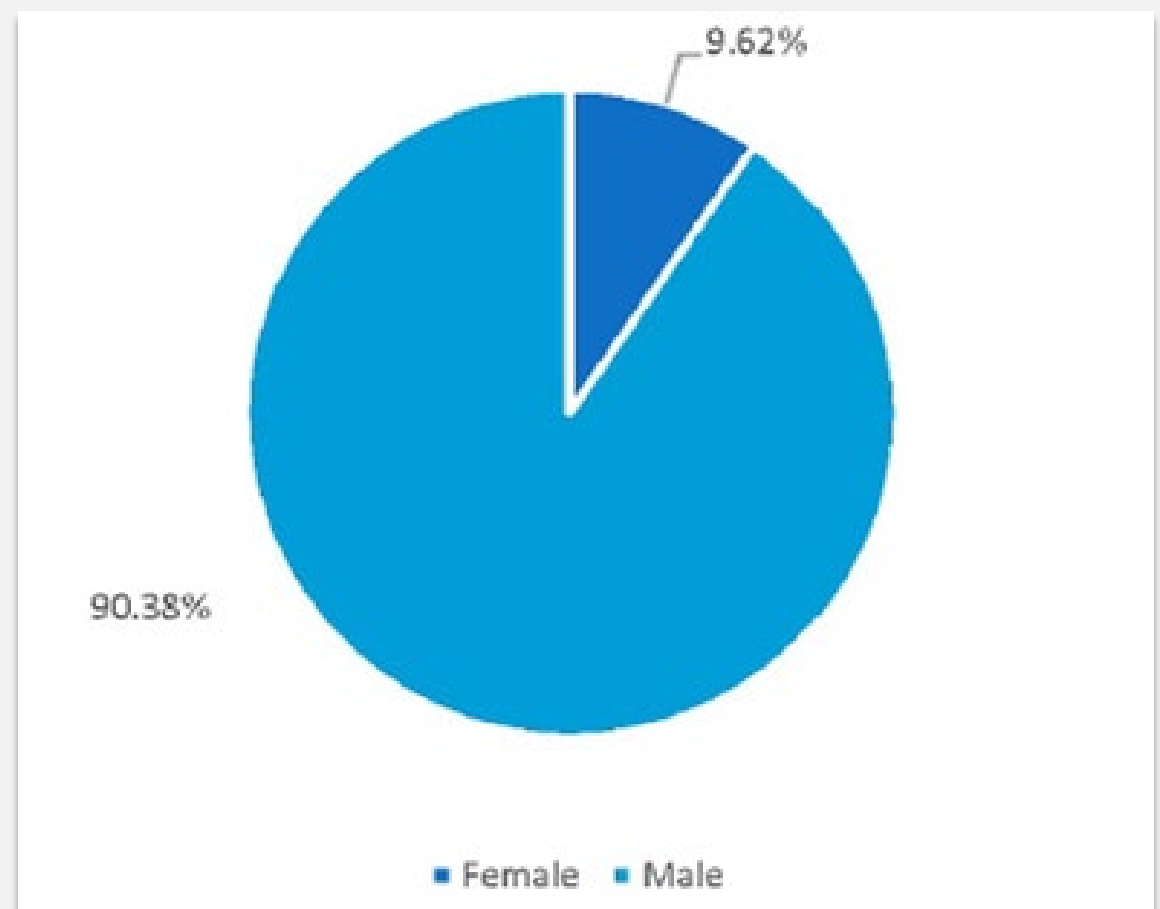

Figure C2. Gender of WPD survey respondents

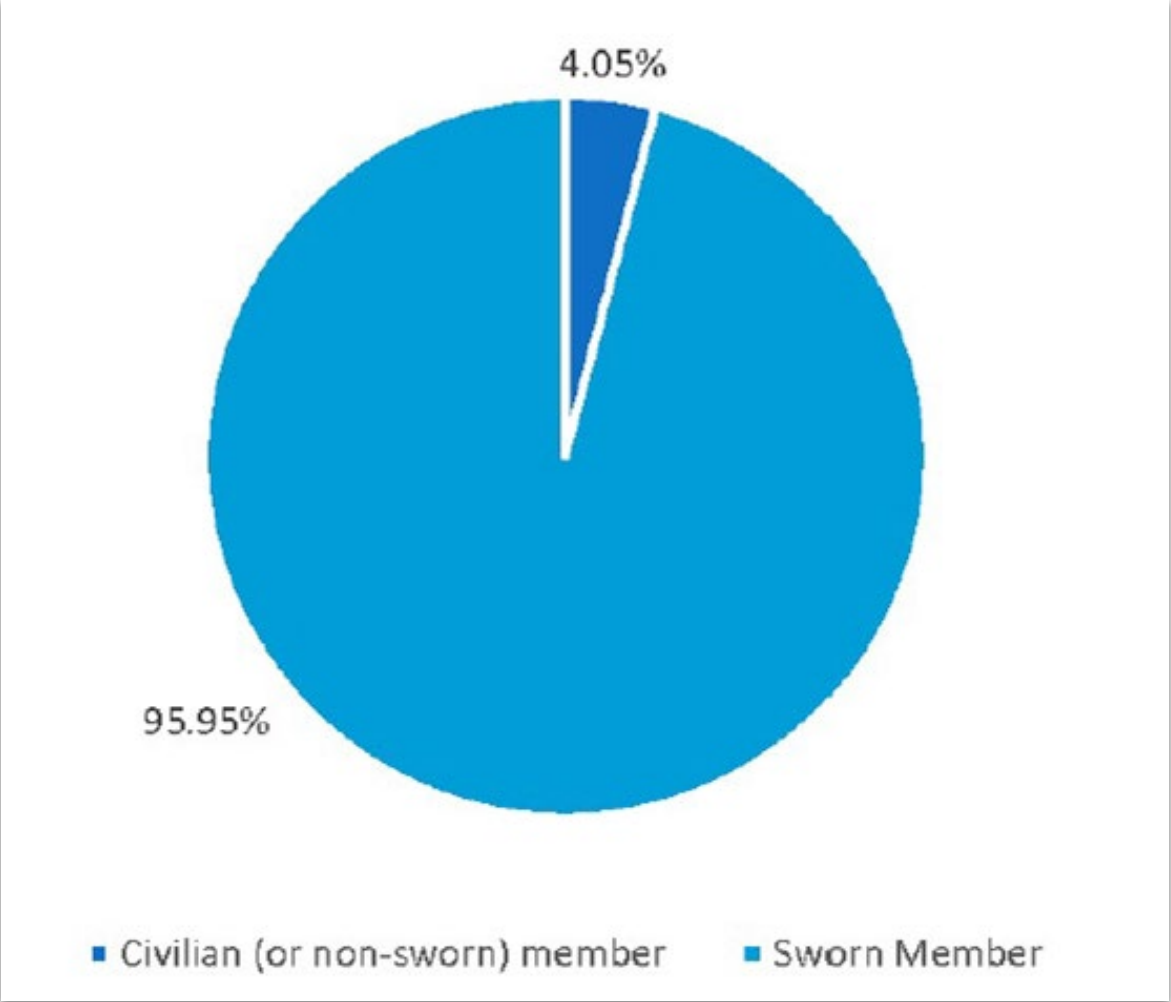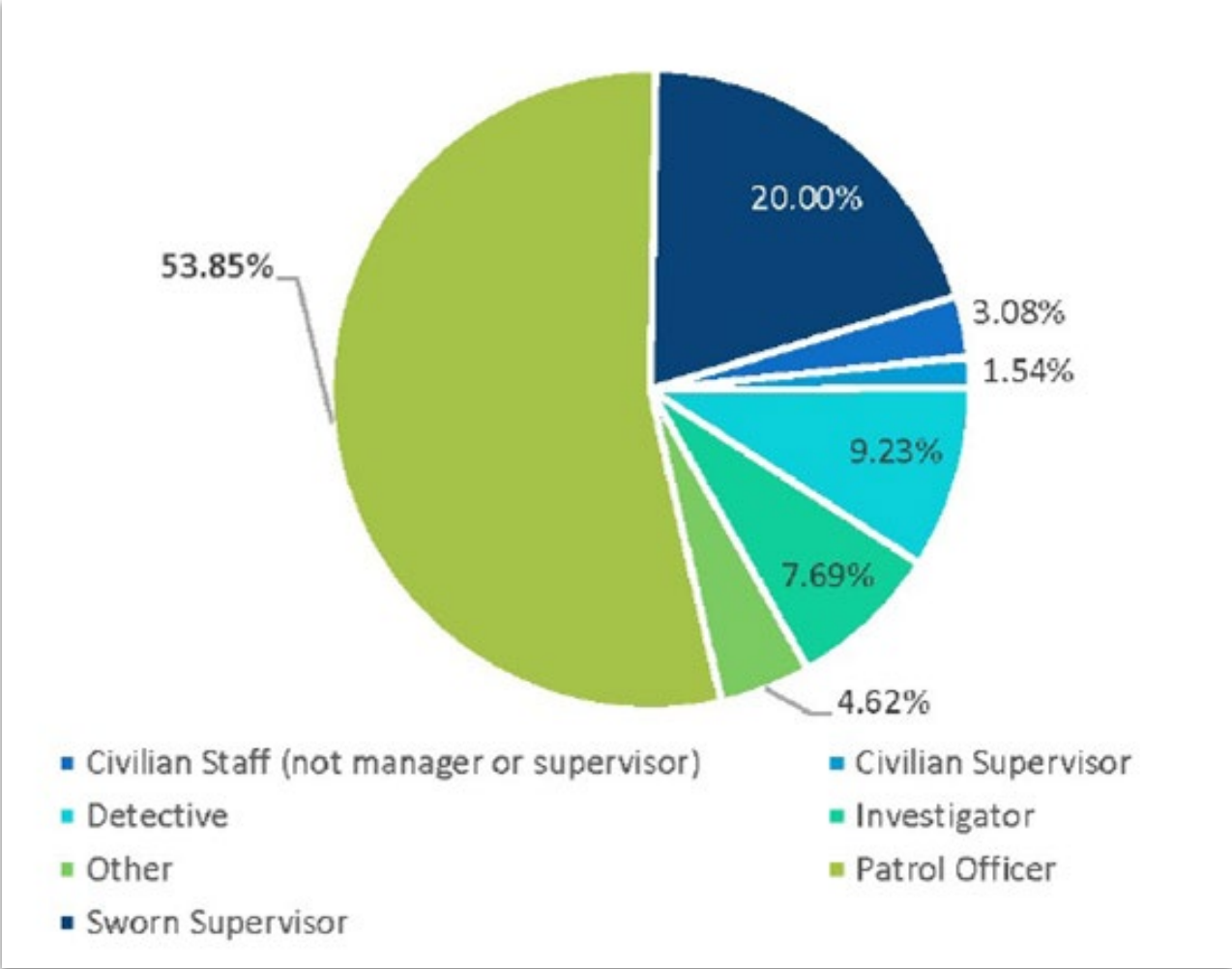**Figure C3. Sworn status of WPD survey respondents**

Figure C4. Position of WPD survey respondents

SURVEY RESULTS

- To comprehensively gauge personnel perspectives on the issues related to this audit, the CNA team asked all sworn and nonsworn WPD personnel to complete an anonymous, 15-minute survey online. The survey included questions related to professional growth, DEI, training, community relations, and professional standards.

- It had a 23.49 percent response rate, with 105 respondents, 95.95% of respondents were sworn personnel. WPD has 450 sworn police officers The majority of the respondents identified as male, sworn staff, and patrol officers, and there was diverse representation in terms of age, education, and racial backgrounds."

- The survey conducted by CNA's audit team focused on the critical theme of equity in the WPD. Participants were asked to evaluate their levels of agreement or disagreement with statements pertaining to equity in the department. The survey included questions about representation and career prospects, seeking to gauge perceptions in these key areas.

- Notably, the survey outcomes indicated that a significant majority of respondents do not perceive various forms of institutional racism in the WPD. However, the survey also revealed that fewer than a quarter of participants strongly believe they are treated fairly by both the WPD leadership and fellow employees.

Table 1. Survey respondents' opinions about equity

	Strongly Agree	Somewhat Agree	Neither Agree nor Disagree	Somewhat Disagree	Strongly Disagree
I feel I am treated fairly by the WPD leadership and employees.	23%	31%	14%	15%	18%
Employees from historically underrepresented racial or ethnic groups receive fewer career opportunities than other employees.	7%	10%	3%	12%	68%
Employees from historically underrepresented racial or ethnic groups receive unfair treatment in hiring and promotion decisions.	3%	4%	9%	9%	74%
I feel that the WPD pays employees equitably regardless of race, ethnicity, or gender.	64%	5%	4%	10%	16%

Source: WPD Racial Equity Audit Survey.[4]

Table 2. Survey respondents' opinions about DEI efforts

	Strongly Agree	Agree	Neither agree nor Disagree	Disagree	Strongly Disagree
The WPD has made significant efforts to diversify its workforce.	39%	43%	11%	3%	4%
The WPD has created a culture of inclusivity and diversity among its staff and ranks.	34%	36%	14%	5%	11%
As it stands, the WPD's staff is reflective of the community it serves.	14%	46%	18%	9%	14%
The WPD should do more to create a racially diverse and inclusive workforce.	5%	19%	49%	12%	14%
Various forms of institutional racism are present in the WPD.	4%	7%	12%	14%	64%

Source: WPD Racial Equity Audit Survey.

Table 3. Survey respondents' opinions about the WPD's professional standards

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
I feel comfortable reporting negative racial or cultural comments made by coworkers.	37%	23%	16%	8%	15%
I feel comfortable reporting negative racial or cultural comments made by a supervisor.	40%	18%	14%	10%	19%
The WPD's policies regarding impartiality and equity are easy to follow and understand.	38%	32%	18%	7%	4%
I feel comfortable and confident sharing my thoughts or concerns with the WPD leadership with the expectation that I will be heard.	22%	13%	8%	17%	40%

Table 3. Survey respondents' opinions about the WPD's professional standards

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
The process for investigating and resolving workplace racism or inequity claims is effective.	25%	26%	22%	6%	21%
I have experienced or witnessed a WPD officer engaging in disrespectful or inappropriate behavior toward another the WPD employee.	14%	10%	19%	21%	36%
The WPD has a transparent process for disciplinary action.	12%	25%	4%	16%	43%
The WPD disciplinary action process benefits individuals who are favored by city officials or command staff.	44%	18%	13%	11%	14%

Table 3. Survey respondents' opinions about the WPD's professional standards

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
I feel comfortable and confident in reporting incidents of racism or cultural insensitivity to supervisors knowing it will result in a fair and impartial investigation.	25%	25%	10%	18%	22%
I feel comfortable and confident reporting an incident when a fellow colleague demonstrated racially or culturally insensitive behavior or language.	29%	32%	11%	10%	18%
I feel comfortable and confident reporting an incident when a supervisor or command officer demonstrated racially or culturally insensitive behavior or language.	30%	22%	12%	10%	26%
All the WPD employees are held accountable after demonstrating inappropriate or offensive behavior.	21%	33%	4%	10%	33%

Source: WPD Racial Equity Audit Survey.

DEI FINDINGS AND RECOMMENDATIONS

FINDING 1: THE WPD CURRENTLY DOES NOT HAVE A PUBLISHED STRATEGY TO GUIDE ITS DEI EFFORTS.

Recommendation 1.1. The WPD in collaboration with the City of Worcester and community members should develop a robust and specific DEI plan.

1.1.1 Engage in discussions with community members and relevant stakeholders to identify critical areas of concern.

1.1.2 Utilize the findings from this report in conjunction with community feedback to establish clear objectives, goals, and metrics aimed at promoting diversity, equity, and inclusion.

1.1.3 Develop potential strategies for improvement.

FINDING 2: THE WPD HAS CREATED A POLICY REVIEW COMMITTEE TO INTEGRATE OFFICER FEEDBACK, BUT THERE REMAINS OPPORTUNITY TO BETTER INTEGRATE FEEDBACK FROM OFFICERS IN THE FIELD.

Recommendation 2.1. The WPD should consider adopting new feedback systems that enable more officers to contribute their insights regarding department policies, procedures and practices related to DEI.

2.1.1 Implement a set of protocols to enable officers to contribute their opinions and provide feedback on WPD policies and practices related to DEI. These protocols could incorporate internal climate surveys, which can be customized based on existing practices in other departments. These procedures may also involve the organization of focus groups with external guidance.

2.1.2 Collect and report findings from the input and feedback obtained through these different approaches.

2.1.3 Develop a plan to incorporate the input and feedback from officers into WPD processes.

FINDING 3: THE WPD'S ONGOING ENGAGEMENT WITH WORCESTER'S HUMAN RIGHTS COMMISSION (HRC) OFFERS OPPORTUNITIES TO BETTER ADDRESS DEI ISSUES.

Recommendation 3.1: The WPD should prioritize enhancing collaboration and communication with the HRC.

3.1.1 Establish a communication plan with the leadership of the Human Rights Commission to address questions and concerns.

3.1.2 Actively respond to concerns previously noted by the Human Rights Commission concerning DEI issues within WPD.

3.1.3 Each year, the WPD reviews their engagement activities to ensure they comply with all reporting requests established by the Human Rights Commission.

FINDING 4: COMMUNITY MEMBERS EXPRESSED CONCERNS THAT THE WPD HAS NOT SUFFICIENTLY ACKNOWLEDGED HOW INSTITUTIONAL POLICING PRACTICES THAT HAVE IMPACTED COMMUNITIES OF COLOR MAY BE NEGATIVELY AFFECTING COMMUNITY TRUST IN LAW ENFORCEMENT.

Recommendation 4.1: The WPD should publicly recognize the findings of this audit's data analysis that identify disparities, and it should take steps to acknowledge past incidents involving communities of color.

4.1.1 Prepare a public presentation for community meetings. Have these presentations address the audit findings and the WPD'S approach to enhancing racial equity. Incorporate relevant local and state history into the presentation to provide specific context.

4.1.2 Deliver presentations using both virtual and in-person platforms at community meetings.

RECRUITMENT, HIRING AND PROMOTIONS

COMMUNITY AND PERSONNEL INTERVIEWS

Interviews Analysis

- Interviewees agreed that WPD should focus on improving recruitment, promotion, discipline and support for officers.

- Stakeholders expressed pressing concern about dearth of diversity in WPD, with POC and women underrepresented.

- Staff and stakeholders expressed concern about favoritism in disciplinary actions and promotions.

- Staff expressed desire to have greater sense of inclusion and representation in discussion of departmental changes and a desire to create a culture of openness and responsiveness inclusive of all officers.

- Interviewees raised concerns about the civil service procedure, with a focus on the WPD reliance on promotional testing that members of the WPD does not adequately assess skills and experience important to promotion.

- Officers indicated that they lacked formalized and comprehensive wellness program, with significant steps needed to bolster officer wellness. Officers expressed desire for a structured wellness program that encompasses a broader spectrum of physical and mental health needs and provides support for the stresses and demands inherent to law enforcement.

DEPARTMENT DATA ANALYSIS, RACE

Figure 4. WPD promotions by race, 2017–2022
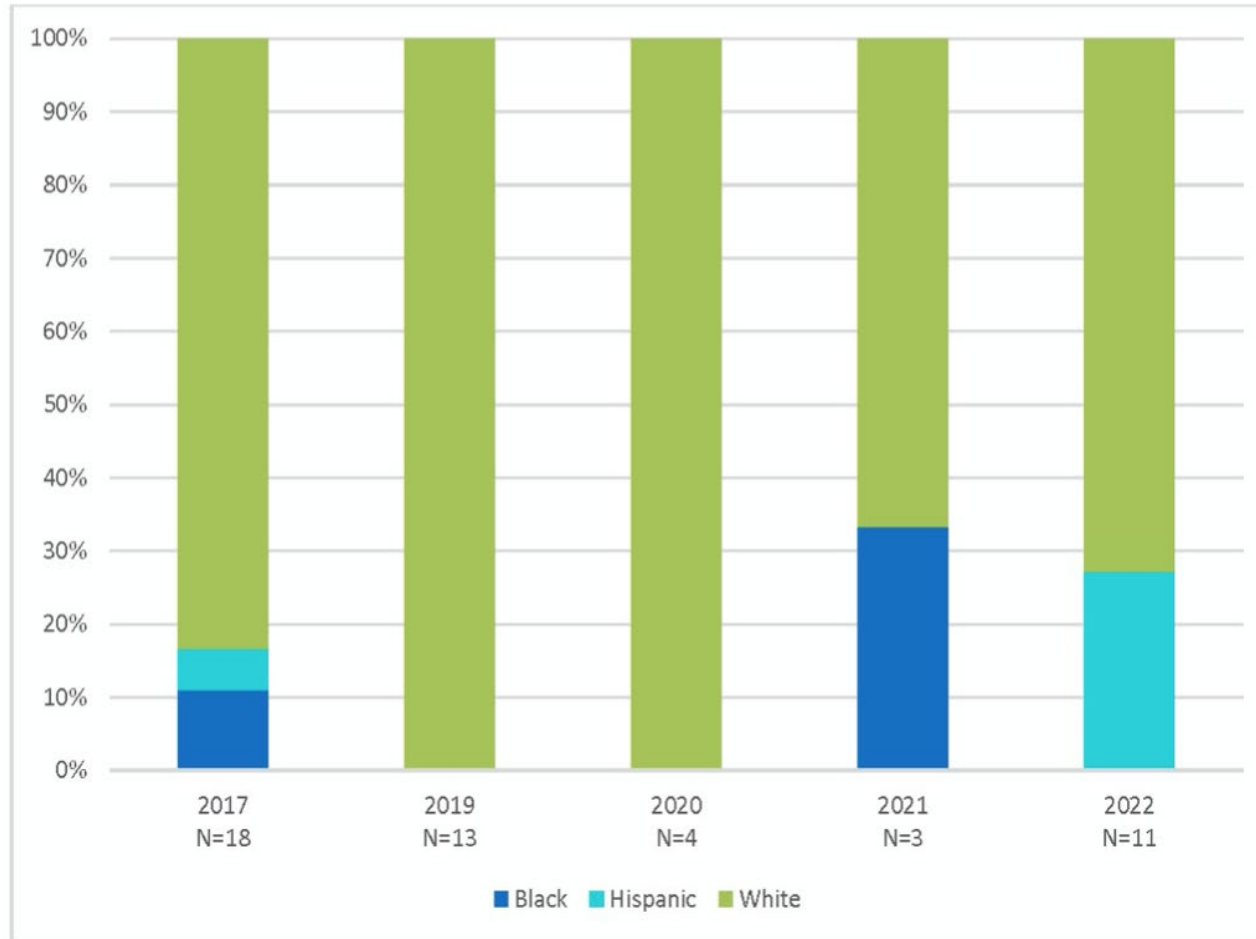
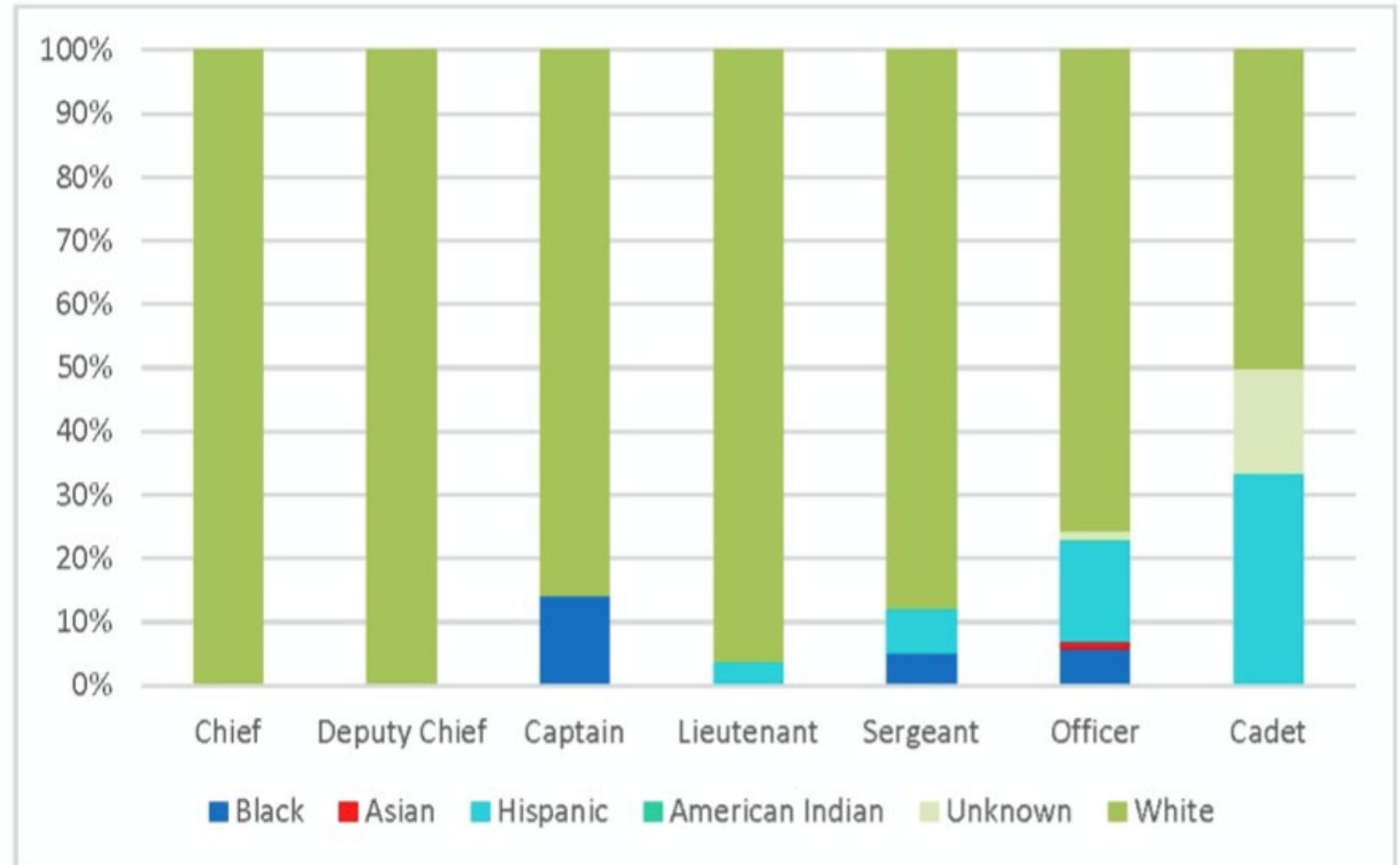Source: Worcester Police Department.

The level of diversity in WPD's workforce has remained limited since 2015, with a noticeable overrepresentation of White staff and an underrepresentation of minority staff members.

DEPARTMENT DATA ANALYSIS, RACE

In recent years, there has been a gradual increase in the representation of minority populations in the WPD.

- Between 2016 and 2022 there has been a 0.6% increase in the number of Black officers.
- Since 2015 there has been a 3% increase in the number of Hispanic officers.

Figure 5. Race distribution of sworn staff at the WPD, 2023

Legend: Black, Asian, Hispanic, American Indian, Unknown, White

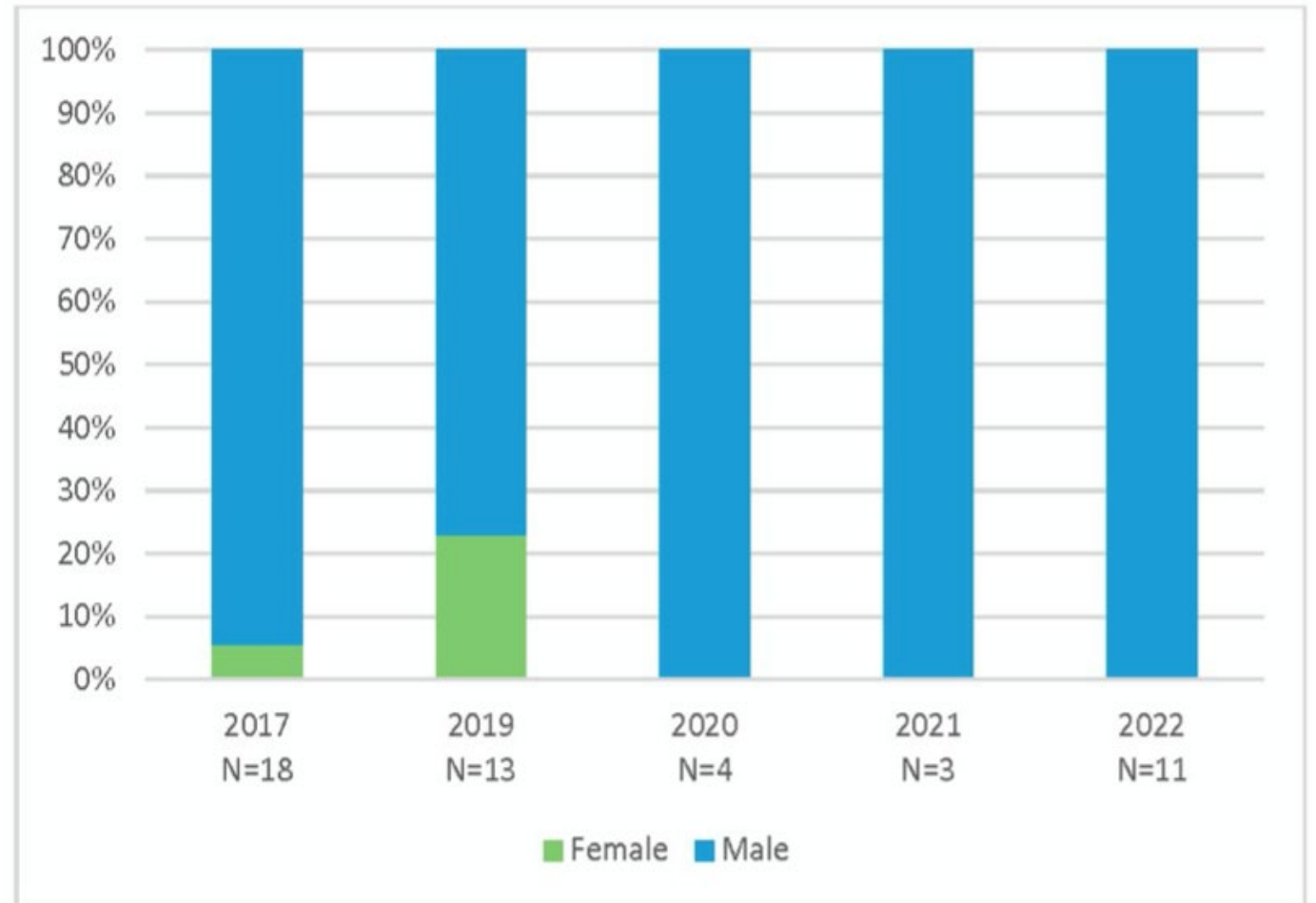Categories: Chief, Deputy Chief, Captain, Lieutenant, Sergeant, Officer, Cadet

Source: Worcester Police Department.

DEPARTMENT DATA ANALYSIS, GENDER

Data revealed that male staff secured the most promotions from 2017 to 2022 with a pattern of gender inequity in promotions over the years.

Figure 3. WPD promotions by gender, 2017–2022

DEPARTMENT DATA ANALYSIS, PROMOTIONS

According to Table 4, which shows the survey respondents' opinions about opportunities for promotion and growth in the WPD Racial Equity Audit Survey, a majority of surveyed staff believe there is not a fair procedure for promotion and growth.

Table 4. Survey respondents' opinions about opportunities for promotion and growth

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
If an employee works hard, they can advance in their career at the WPD.	22%	19%	14%	14%	32%
Promotions in the WPD are based on job-related qualifications.	9%	9%	19%	18%	45%
The process for promotion, as it currently stands, is fair and impartial.	16%	23%	19%	15%	26%
The WPD promotion process benefits individuals who are favored by city officials or command staff.	25%	16%	16%	14%	29%
Opportunities for career success or advancement can be negatively affected by a person's race or ethnicity.	6%	13%	9%	6%	67%
Opportunities for career success or advancement can be negatively affected by a person's gender identity.	8%	7%	7%	10%	68%
Opportunities for career success or advancement can be negatively affected by a person's sexual orientation.	5%	7%	10%	11%	67%
The WPD and its leadership provide me with valuable opportunities to grow professionally.	11%	22%	14%	19%	35%
I would recommend the WPD as a workplace to others.	14%	18%	20%	16%	32%

Source: WPD Racial Equity Audit Survey.

RECRUITMENT, HIRING AND PROMOTIONS
FINDINGS AND RECOMMENDATIONS

FINDING 5: THE WPD'S WORKFORCE HAS LIMITED DIVERSITY AND DOES NOT HAVE A ROBUST OR SPECIFIC PLAN TO HIRE FOR DIVERSITY WITHIN THE DEPARTMENT.

Recommendation 5.1 The WPD should amend its recruitment plan to strategically increase diversity.

5.1.1 Establish a working group consisting of representatives from city departments, colleges, and community organizations to work together to discuss innovative recruitment initiatives.

5.1.2 Engage in a collaborative effort with the city to develop a revised and detailed recruitment plan that focuses innovative approaches to attract individuals from underrepresented groups.

5.1.3 Develop detailed, targeted outreach strategies tailored to specific communities in order to effectively engage individuals from underrepresented groups during the recruitment process.

5.1.4 Conduct annual evaluations of the impacts of the DEI-focused recruitment initiatives, ensuring that they are continuously improved. Conduct evaluations in partnership with the working group, making necessary adjustments as required.

FINDING 6: THE WPD'S CURRENT RECRUITMENT POLICY DOES NOT REFLECT THE DEPARTMENT'S INTENTION TO CREATE A DIVERSE WORKFORCE.

Recommendation 6.1. The WPD should amend its recruitment policy to articulate its commitment to actively diversifying its workforce through targeted outreach efforts.

6.1.1 Review the recruitment policies of other departments relative to enhancing diversity to identify best practices and potential strategies to implement within WPD.

6.1.2 Engage in active collaboration with members of WPD to gather insights on the priorities and needs related to diverse recruitment and hiring.

6.1.3 Revise the existing recruitment policy to highlight diversity and inclusivity as essential components of the hiring practices.

FINDING 7: THE CITY'S PROMOTION PROCESS HAS HISTORICALLY ADVANCED INDIVIDUALS AT WPD WHO DO NOT REFLECT DIVERSITY.

Recommendation 7.1: The City, in consultation with WPD's stakeholders, should amend its promotion process to identify diverse leaders, offer more mentorship opportunities, and explore candidates from other departments.

7.1.1 7.1.1 Hold discussions with the WPD and city leadership regarding the possibility of recruiting candidates from other law enforcement departments with diverse backgrounds who meet or exceed the WPD's leadership criteria.

7.1.2 Develop and implement a mentorship program to identify and guide potential leaders from underrepresented groups.

7.1.3 Make revisions to department policy that reflect newly established programs and processes.

FINDING 8: BOTH WPD STAFF AND COMMUNITY MEMBERS RAISED CONCERNS THAT THE WPD'S CURRENT PROMOTION PROCESS MAY BE LACKING.

Recommendation 8.1: The City, in consultation with WPD stakeholders, should consider removal from the Massachusetts civil service system, enabling the department to tailor its hiring and promotions policies more effectively in order to advance equity and diversity.

8.1.1 Engage in collaboration with community members and other key stakeholders to consider removal from Civil Service.

8.1.2 Develop an internal and external group lead by the mayor's office to review options and make recommendations to Mayor and City Council regarding the removal from the Massachusetts Civil Service System.

8.1.3 Seek model practices within Massachusetts and adopt new hiring and promotion policies.

8.1.4 Engage with affected collective bargaining units (as required).

FINDING 8: BOTH WPD STAFF AND COMMUNITY MEMBERS RAISED CONCERNS THAT THE WPD'S CURRENT PROMOTION PROCESS MAY BE LACKING (continued)

Recommendation 8.2: The City, in consultation with WPD stakeholders, should consider revising promotions criteria to give additional weight to experience and other valued characteristics.

8.2.1 Review the promotion policies of other departments to identify best practices and potential strategies to implement within WPD.

8.2.2 Conduct a comprehensive review of the current promotion criteria to identify areas where experience and other valued characteristics can be integrated effectively.

8.2.3 Collaborate with department leadership and relevant outside stakeholders to develop a revised promotion policy that places increased emphasis on experience and other essential attributes.

8.2.4 Engage in consultation with external experts or consultants who specialize in law enforcement promotions to ensure the revised criteria align with best practices.

POLICY AND PRACTICE ARREST PROCEDURES

COMMUNITY INPUT AND INTERVIEW ANALYSIS

Community Listening Sessions

- Community members expressed concerns social media posts shared by WPD members which some found offensive and divisive and felt contributed to a sense of disunity within the community.

Interviews Analysis

- WPD and local stakeholders believe department has done a good job keeping the city safe.
- Community members voiced concerns about racial equity in police interactions with communities of color.
- WPD officers voiced concerns about lack of a formalized and comprehensive wellness program.
- WPD officers voiced a preference for more hands-on, scenario-based training that is directly applicable to their work in the field.
- Community members and external stakeholders raised concerns about racial bias and inequity within the WPD, with unease surrounding comments make by WPD leadership asserting the absence of institutionalized racism in the department

DOCUMENT REVIEW: POLICIES AND PROCEDURES

- Overall, the WPD policy manual is comprehensive and aligned with industry standards.

- The WPD policy on Bias Free Policing and Profiling is well written.

- There is, however, a pressing need to update specific policies, particularly those concerning juvenile arrests, recruitment and social media usage.

DOCUMENT REVIEW: POLICIES AND PROCEDURES

- Revisions of WPD juvenile arrest policy should incorporate measures aimed at safeguarding juvenile privacy and alternative to arrest.

    - Current juvenile policy is focused on detention, interrogation and release procedures

    - Juvenile policy should reference alternative to arrest.

    - Juvenile policy fails to establish specific privacy protections for underage offenders.

- Department policy on social media use by officers should be expanded.

    - Current policy does not define content reflecting bias nor reference department policies or training related to bias.

    - Current policy does not describe consequences for engaging in biased behavior on social media or any system for reporting this behavior.

DEPARTMENT DATA ANALYSIS, POLICY AND PRACTICE ARREST PROCEDURES, PART I

- Analysis hindered by absence of comprehensive data on racial demographics.

- Current reports do not collect detailed information on race/gender/age during stops or police interactions.

- Analysis of arrest and citation data from 2017-2021 reflected racial disparities, with Black and Hispanic individuals being overrepresented

- When officers have higher levels of discretion, disparities decrease

- Analysis revealed decline in arrests after 2019, which might be attributed to the pandemic.

- From 2017-2021, most common age group for arrests was 18-44, with a peak for those aged 26-35.

DEPARTMENT DATA ANALYSIS, POLICY AND PRACTICE ARREST PROCEDURES, PART I

- Racial disparities in arrests are seen in the younger age brackets
  - Black youth account for 28.9% of juvenile arrests (as compared with 16.6 percent of the school age population).
  - Hispanic youth accounted for 48.8% of juvenile arrests (as compare with 43.3 percent of the school age population).
  - White youth accounted for 18.1% of juvenile arrests (as compared with 29.1 percent of the school age population).
- Overall racial disparities in arrests did not increase during high discretion arrests.
- Disparities in arrests often coincide with concentrated police activity in certain demographic areas.

- Racial disparities are also seen in overall arrest data.
  - Black individuals account for 20.5 percent of arrests (as compared with 12 percent of the population), meaning <mark>Black individuals are approximately 2.2 times more likely to be arrested than their White counterparts.</mark>
  - Hispanic youth accounted for 34.7 percent of arrests (as compare with 24 percent of the population), meaning <mark>Hispanic individuals are approximately 2 times more likely to be arrested than their White counterparts.</mark>
  - White youth accounted for 40.9 percent of arrests (as compared with 53 percent of the population).
- Racial disparities are also seen in citation data, but the disproportionality is less, meaning that citations had a more equitable distribution than arrests.
- Overall racial disparities in arrests did not increase during high discretion arrests.
- Disparities in arrests often coincide with concentrated police activity in certain demographic areas.

DEPARTMENT DATA ANALYSIS, TRAINING

Table 6 of the WPD Racial Equity Audit Survey shows a substantial number of respondents to the WPD survey expressed a high level of satisfaction with the department's training program.

Table 6. Survey respondents' opinions about training in general

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	N/A
The WPD has an adequate field-training program for entry-level officers to train with senior officers.	23%	35%	12%	14%	15%	1%
All of the training we receive is adequate in terms of subject matter and content.	14%	34%	16%	17%	17%	1%
All of the training we receive is adequate in terms of length and amount of time spent learning about the topic and concepts.	13%	32%	19%	15%	18%	3%
Our instructors are effective and knowledgeable about the subject matter.	25%	37%	12%	5%	15%	5%

Source: WPD Racial Equity Audit Survey.

POLICY & PRACTICE
FINDINGS AND RECOMMENDATIONS

FINDING 9: THE AUDIT TEAM WAS UNABLE TO COMPLETE SEVERAL ANALYSES ON RACIAL DISPARITIES FOR USE OF FORCE, TRAFFIC STOPS, AND PEDESTRIAN STOPS OR FIELD CONTACTS BECAUSE OF A LACK OF ADEQUATE DATA CONTAINING RACIAL DEMOGRAPHICS.

Recommendation 9.1 The WPD should enhance its ability to gather data that identifies racial or ethnic disparities in such areas as use of force, traffic stops, pedestrian stops, and field contacts.

9.1.1 Implement a comprehensive data collection system that includes demographic information for all officer interactions related to stops, searches, and seizures.

9.1.2 Establish an annual reporting process to analyze and categorize this data based on ethnicity, race, gender, and location.

9.1.3 Assign personnel that will be responsible for publishing completed annual reports on the WPD website.

9.1.4 Utilize the insights gained from data analysis to enhance training programs and improve policing practices.

Recommendation 9.2: The WPD should make these data publicly accessible.

9.2.1 Develop a user-friendly section on the WPD website where new data points can be accessed by the public.

9.2.2 Ensure regular updates in making the data readily available on the WPD website.

FINDING 10: INDIVIDUALS FROM BLACK AND HISPANIC COMMUNITIES FACE A HIGHER RATE OF ARRESTS COMPARED TO THEIR WHITE COUNTERPARTS.

Recommendation 10.1. Create a robust data collection system to inform the development of a plan aimed at addressing disparities in arrests within Black and Hispanic communities.

10.1.1 Evaluate the existing protocols for data collection and incorporate new identifiers to capture race and ethnicity.

10.1.2 Implement a robust data collection and monitoring system to identify disparities in arrests.

10.1.3 Establish a plan to address any identified disparities and regularly review the plan with the community.

10.1.4 Publish annual reports which include an analysis of any disparities identified.

FINDING 11: THE WPD'S DATA HIGHLIGHT A DISPROPORTIONATE LEVEL OF ARRESTS AMONG YOUTH OF COLOR.

Recommendation 11.1: The department should collaborate with local stakeholders to establish new arrest-diversion strategies for youth.

      11.1.1 Collaborate with stakeholders from the Worcester Youth Violence Prevention Initiative as well as other key stakeholders in social services, education, and mental health to discuss innovative arrest diversion approaches for the department.

      11.1.3 Develop and implement new approaches that prioritize diversion strategies and alternatives to arrest for youth.

      11.1.4 Regularly assess the effectiveness of diversion strategies and non-arrest alternatives in reducing disparities in youth arrests

Recommendation 11.2: The WPD should amend its policy to reflect the adoption of effective diversion and alternatives to arrest.

      11.2.1 Make revisions to department policy that reflect newly established programs and processes.

HRC REQUEST RELATED TO FINDING 11, Part I

The HRC respectfully reiterates its request, as passed by motion at the March 25, 2024, Public Meeting, that the WPD make changes to its draft Juvenile Arrest Policy to incorporate research-based best practices and to address the following concerns:

- That the current draft does not reference or give preference to juvenile diversion programs as recommended in the Race Equity Audit.

- That the current draft does not reference or set procedures to ensure the protection of juvenile privacy as recommended in the Race Equity Audit.

- That the current draft does not require the collection and public posting of disaggregated data on juvenile arrests, to include place of residence, age, race, gender, and ethnicity as recommended in the Race Equity Audit.

- That the current draft does not require the use of the least restrictive means of restraint.

- That the current draft does not provide for age-based limitations on the use of force.

See HRC Memo to the City Manager, titled "Re: The Human Rights Commission's Approved Motion from the Public Meeting on March 25, 2024."

HRC REQUEST RELATED TO FINDING 11, Part II

The HRC further requests that the WPD adopt youth specific policies relative to youth interactions to ensure developmentally appropriate, trauma-informed, equitable interactions that comply with the law.

In particular, the HRC requests that the WPD adopt model policies 1-12 created by Strategies for Youth.

The model policies recommended by Worcester HRC address:

1- Guidelines for youth interaction

2- Investigatory Stops, Non-custodial Interviews, Search and Seizure of Youth

3- Arrest, Transport, Booking and Temporary Custody

4- Miranda Warnings, Waiver of Rights & Youth Interactions

5- Use of Force with Youth

6- Fair and Impartial Policing of Youth: Race, National Origin and Immigration Status

7- Fair and Impartial Policing: LGBTQ+ Youth

8- Policing of Youth with Disabilities, Experiencing Mental Health Crises, or Impaired by Drugs or Alcohol

9-Protection of Youth Who are Vulnerable Due to the Arrest of Parents or Other Caregivers, the Execution of Residential Search Warrants, or Commercial Sexual Exploitation

10- Law Enforcement Interaction with Students

11- Data Collection

12- Transparency and Accountability

See Juvenile Law Center National Scorecard on Juvenile Records, Juvenile Law Center National Review of State Laws on Juvenile Records and 12 Model Law Enforcement Policies for Youth Interaction

FINDING 12: THE WPD'S POLICY ON JUVENILE ARRESTS IS 19 YEARS OLD AND LACKS IMPORTANT LANGUAGE REGARDING THE PROTECTION OF JUVENILE PRIVACY.

Recommendation 12.1: The WPD should review its policy on juvenile arrests and discuss potential revisions that would address privacy concerns associated with juvenile arrests.

12.1.1 Review the juvenile arrest policies of other departments to identify best practices and potential strategies to implement within WPD.

12.1.2 Seek input from other justice and community stakeholders to gather their perspectives on proposed changes to policy.

12.1.3 Discuss potential revisions in the current policy in accordance with best practices for juvenile arrest after conducting a thorough review existing policies.

HRC Request Related to FINDING 13

- The HRC respectfully requests that the WPD adopt policies to protect the privacy of juveniles interacting with the WPD by limiting access to and the use of law enforcement records involving juveniles in order to limit the risk that disclosure will result in the misuse or misinterpretation of the information which could result in the unnecessary denial of opportunities and/or benefits to the juvenile.
- HRC has based this request and its articulation of core principles found on the next slide from the Models for Change publication on model juvenile records policy found at: https://www.modelsforchange.net/publications/652/Juvenile_Records_A_National_Review_of_State_Laws_on_Confidentiality_Sealing_and_Expungement.pdf

HRC Request Related to FINDING 13 (continued)

Any and all such policies should comply with the core principles for juvenile record protection set forth below:

- Youths' law enforcement and court records are not widely available and are never available online;
- Sealed records are completely closed to the general public;
- Expungement means that records are electronically deleted and physically destroyed;
- At least one designated entity or individual is responsible for informing youth about the availability of sealing or expungement, eligibility criteria, and how the process works;
- Records of any offense may be eligible for expungement;
- Youth are eligible for expungement at the time their cases are closed;
- There are no costs or fees associated with the expungement process;
- The sealing and expunging of records are automatic—i.e., youth need not do anything to initiate the process and youth are notified when the process is completed;
- If sealing or expungement is not automatic, the process for obtaining expungement includes youth-friendly forms and is simple enough for youth to complete without the assistance of an attorney; and
- Sanctions are imposed on individuals and agencies that unlawfully share confidential or expunged juvenile record information or fail to comply with expungement orders.

FINDING 13: THE WPD COULD ENHANCE INCLUSIVITY BY ESTABLISHING DIGITAL PLATFORMS THROUGH WHICH THE COMMUNITY COULD ENGAGE IN POLICY REVIEW AND OFFER FEEDBACK.

Recommendation 13.1:The WPD should consider expanding its efforts to share policies with the public by posting draft policies on its website for public comment.

13.1.1 Establish a user-friendly online platform for the WPD to post public draft policies.

13.1.2 Create a clear and accessible process for community members to submit comments and feedback on these draft policies.

13.1.3 Promote the online platform for department policy review, encouraging community participation and feedback.

FINDING 14: THERE ARE VARYING OPINIONS AMONG WPD OFFICERS REGARDING THE VALUE OF CRISIS INTERVENTION TEAM 40-HOUR TRAINING; HOWEVER, EXPANDING THE PROGRAM TO INCLUDE ALL OFFICERS HAS THE POTENTIAL TO INCREASE COMMUNITY INTERACTIONS.

Recommendation 14.1: The WPD should create a plan to expand Crisis Intervention Team training to all of its officers.

 14.1.1 Designate a staff member to oversee the training expansion of all sworn personnel.

 14.1.2 Establish a plan to deliver mandatory CIT training sessions for all officers in the WPD.

 14.1.3 Establish a formal tracking process to ensure all officers receive CIT

Recommendation 14.2: The WPD should integrate community feedback into the expansion of its crisis intervention training curriculum.

 14.2.1 Establish an ongoing evaluation and feedback system to consistently enhance CIT training.

FINDING 15: WPD HAS OPPORTUNITIES TO IMPROVE DELIVERY OF TRAININGS THAT ENABLE OFFICERS TO ADDRESS COMMUNITY NEEDS APPROPRIATELY.

Recommendation 15.1: The WPD should collaborate with staff to enhance and expand scenario-based exercises to give officers practical learning opportunities on important topics like cultural competency, trauma-informed policing, the duty to intervene, de-escalation, the use of force and problem-oriented policing.

15.1.1 Collaborate with law enforcement training experts and staff to identify ways to improve in-person training by incorporating realistic scenario-based exercises.

15.1.2 Establish partnerships with local organizations and community spaces to create diverse training environments that simulate real-world situations.

15.1.3 Establish a system of ongoing evaluation and feedback from both trainers and trainees to enhance training.

Recommendation 15.2: The WPD should involve a diverse range of community members in the scenario-based training sessions.

15.2.1 Conduct outreach to engage individuals from diverse backgrounds to participate in scenario-based training sessions.

15.2.2 Regularly evaluate the efficacy of the scenario-based training program, incorporating feedback and outcomes to better meet community expectations.

FINDING 16: OPPORTUNITIES EXIST FOR THE WPD TO CONTINUE TO IMPROVE THE DEPARTMENT'S FIELD-TRAINING OFFICER (FTO) PROGRAM.

Recommendation 16.1: The WPD should continue to revamp its field-training program using nationally recognized self-evaluation approaches and formalize the program in WPD policy.

16.1.1 Review current field-training program to ensure it includes a comprehensive selection criterion for Field Training Officers (FTOs) that considers experience, communications, and commitment to the department's values and diversity.

16.1.2 Hold regular feedback sessions between FTOs and trainees to inform program improvement.

16.1.3 Regularly review and update the field-training program.

FINDING 17: WPD OFFICERS HAVE CONCERNS ABOUT THE OFFICER WELLNESS PROGRAM AND FEEL THAT IT NEEDS IMPROVEMENT TO ALIGN WITH BEST PRACTICE.

Recommendation 17.1 The WPD should conduct a comprehensive review of its officer wellness support and develop a plan to expand the availability of support services for its rank and file.

17.1.1 Review the wellness programs offered by other departments to identify best practices and potential strategies to implement within WPD.

17.1.2 Collaborate with rank-and-file leaders to develop a plan to improve officer wellness support and services.

17.1.3 Implement a comprehensive wellness program that encompasses the holistic aspects of mental, emotional, and physical health.

17.1.4 Deliver training sessions to officers focusing on areas such as mental health, self-care techniques, and stress management strategies.

17.1.5 Conduct regular evaluations of wellness initiatives to ensure their effectiveness and make any needed modifications.

COMMUNITY ORIENTED POLICING

COMMUNITY INPUT AND INTERVIEW ANALYSIS

Community Listening Sessions

- Within Worcester's growing and diverse immigrant community, concerns have emerged regarding interactions between WPD officers and individuals with LEP. A significant theme arose highlighting instances in which officers used force on individuals who struggled to comprehend commands due to language barriers.
- Community members expressed concerns about WPD social media posts found to be offensive and divisive- contributing to a sense of disunity.
- Community members expressed desire for increased police presence and engagement in their neighborhoods- with police officers stepping out of their vehicles and engaging in conversations- promoting greater interaction and cultivating positive relationships.
- Community members indicated that monthly WPD community meetings should foster more collaboration, with more effective advertising and more substantive content.

Interviews Analysis

- Community members and local stakeholders believe that improved relations could allow the department to understand their perspectives and foster community trust.
- To fulfill role as community-oriented law enforcement agency, composition of WPD should mirror that of community it serves.
- Community engagement is currently siloed within specific units with the need for more comprehensive community outreach.
- Collaboration between HRC and WPD could be strengthened through more frequent meetings, data preparation and long-term goals for collaborative efforts.

DEPARTMENT DATA ANALYSIS, COMMUNITY ORIENTED POLICING

- Most respondents to the WPD survey expressed the belief that officers treat community members with respect regardless of their demographic background.
- Police relations with individuals under 25 years of aged received the lowest relationship quality ranking.
- A majority of officers agreed that the department provides the community with many opportunities to engage and voice their concerns and rejected the idea that the department would benefit from adopting a community advisory group.

Table 8. Survey respondents' opinions about the WPD's relationship with the community

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
The WPD has a positive relationship with the community.	28%	43%	17%	8%	4%
The WPD has built a positive relationship with its growing immigrant population.	18%	44%	30%	5%	3%
WPD officers treat all community members with respect regardless of their race, ethnicity, or background.	56%	33%	7%	4%	0%
The WPD should improve communication with community members with limited English proficiency.	8%	28%	46%	14%	3%
The WPD provides the community with many opportunities to engage and communicate with command officers to express their concerns and issues.	19%	42%	18%	14%	7%
The WPD would benefit from adopting a community advisory group (a community group that formally provides input to the department on policy and practice).	8%	9%	16%	22%	45%

Source: WPD Racial Equity Audit Survey.

COMMUNITY ORIENTED POLICING FINDINGS AND RECOMMENDATIONS

FINDING 18: THE WPD DOES NOT HAVE A CLEAR PLAN TO GUIDE ITS COMMUNITY POLICING STRATEGY.

Recommendation 18.1 The Neighborhood Response Team (NRT), in collaboration with other WPD members, should develop a formal plan for improving community engagement for the department.

18.1.1 Create a cohesive team of WPD members, including DEI officers, to develop an effective community policing strategy.

18.1.2 Develop clear objectives, measurable goals, and outcome indicators to build a comprehensive action plan.

18.1.3 Establish a comprehensive plan that promotes integration and collaboration among various department units and officers.

18.1.4 Regularly review the implemented strategy to evaluate its impact and make any necessary improvements.

HRC Requests Related to Finding 18

Consistent with the concerns voiced in the community listening sessions regarding interactions between WPD officers and individuals with Limited English Proficiency, the HRC reiterates its request to both the City Manager and the WPD that the WPD makes changes to its LEP Policy to incorporate research-based best practices, including a statement that under Title VI of the Civil Rights Act of 1964, all LEP persons have the right to language assistance that results in accurate, timely and effective communication with law enforcement at no cost.

For detailed recommendations on desired changes to the draft LEP Policy of the WPD, please see HRC Memo to the City Manager, titled "Re: The Human Rights Commission's Approved Motion from the Public Meeting on March 25, 2024" and minutes of the May 6, 2024, Public Meeting of the HRC.

FINDING 19: ALTHOUGH THE WPD IS ACTIVELY ENGAGED IN NUMEROUS YOUTH-ENGAGEMENT EFFORTS AND PARTNERSHIPS, IT LACKS A FORMAL PLAN TO GUIDE THOSE ENGAGEMENTS.

Recommendation 19.1: To strengthen its engagement with at-risk youth, the WPD should develop a plan to strategically expand initiatives and partnerships that are aimed at achieving this goal.

19.1.1 Collaborate with existing community partners to assess gaps in current youth engagement programs.

19.1.2 Develop a structured plan that clearly outlines specific objectives and strategies for expanding and enhancing community partnerships.

19.1.3 Identify and forge new partnerships within the community to bolster outreach efforts, leveraging the expertise and resources of these organizations to further enhance the delivery of youth services and support.

HRC Requests Related to Finding 19

HRC Recommendation from the March 2024 HRC Meeting:

Pursuant to recommendation 19.1, 19.1.1, 19.1.2, HRC respectfully recommends the City Manager works with WPD to review the Youth Violence Prevention Initiative, and consider providing an update to the presentation to HRC found in the 8/7/17 HRC meeting minutes

Pursuant to Recommendation 19.1.2, HRC further requests that the City Manager ask that WPD share an estimated timeline for the development of this structured plan with HRC, and to share a copy with us once it is developed.

FINDING 20: THE ROLES OF THE DIVERSITY AND LGBTQ OFFICERS COULD BE EXPANDED.

Recommendation 20.1: The WPD should elevate the roles of diversity and LGBTQ officers to develop a plan to lead comprehensive diversity and inclusion initiatives across the department.

20.1.1 Expand the roles of diversity and LGBTQ officers to include the development of comprehensive strategies that involve all WPD staff members.

20.1.2 Develop a plan aimed at fostering a culture of collective responsibility for diversity and inclusion among all officers.

20.1.3 Establish regular feedback mechanisms or forums where staff can share ideas and concerns related to diversity and inclusivity with diversity and LGBTQ officers.

HRC Requests Related to Finding 20

Pursuant to Recommendation 20.1, 20.1.1, 20.1.2, 20.1.3, HRC respectfully requests that the City Manager ask WPD to share a status update from the formal request made to WPD in September 2020 for WPD to "conduct an anonymous survey among its officers who are people of color and ask:
   1) Have they experienced discrimination at work?
   2) Have they experienced discrimination outside of work?"

HRC further recommends that this survey be expanded upon and that an annual version of this survey be developed (e.g. "have you experienced discrimination at work/outside of work in the past year?")

FINDING 21: THE ROLE OF COMMUNITY ENGAGEMENT COULD BE EXPANDED TO ALL SWORN WPD OFFICERS.

Recommendation 21.1: The WPD should expand the involvement in community engagement activities and events to all officers.

21.1.1 Assign a WPD officer to lead the development of a comprehensive strategy that promotes greater participation within the police department in community engagement.

21.1.2 Implement approaches that encourage all officers to actively engage and take part in initiatives aimed at fostering stranger connections with the Worcester community.

21.1.3 Establish a method of tracking engagement activities of officers.

HRC Requests Related to Finding 21

HRC would like to extend an open invitation to the members of leadership overseeing initiatives outlined in recommendations 21.1, 21.1.1, 21.1.2, 21.1.3, to provide a forum for collaboration and partnership with HRC.

HRC respectfully requests that the City Manager work with WPD to share updates with us on this comprehensive strategy as they become available

FINDING 22: THE WPD HAS AN ACTIVE SOCIAL MEDIA PRESENCE AND HAS THE OPPORTUNITY TO LEVERAGE ITS PLATFORM TO PROMOTE THEIR DIVERSITY EFFORTS IN ITS COMMUNITY ENGAGEMENTS.

Recommendation 22.1. The WPD should build upon its existing social media presence while also incorporating content that highlights its commitment to creating an inclusive department and community.

22.1.1 Explore the possibility of seeking outside assistance or consulting with experts to review and enhance social media strategies used by other departments known for promoting inclusivity.

22.1.2 Develop a plan to prioritize social media content that highlights the department's commitment to creating an inclusive environment within both the department and the community it serves.

FINDING 23: WORCESTER'S COMMUNITY MEMBERS HAVE EXPRESSED CONCERNS ABOUT SOME WPD MEMBERS' SOCIAL MEDIA USE, AND THE WPD SOCIAL MEDIA POLICY PROVIDES INSUFFICIENT GUIDANCE FOR OFFICERS.

Recommendation 23.1. The WPD should consider amending its social media policy and providing additional training, within the confines outlined in the constitution, to offer guidance for department review of off-duty use of social media.

23.1.1 Evaluate the existing social media policy to identify any deficiencies in its guidance and notifications regarding off-duty usage.

23.1.2 Rectify any gaps in the policy that pertain to notifying and investigating instances of inappropriate off-duty usage.

23.1.3 Engage in a conversation with staff members to address any lingering concerns related to the proposed policy changes.

HRC Requests Related to Finding 23

Although additional formal recommendations have yet to be made by HRC regarding Finding 23, HRC acknowledges community member concerns regarding WPD members' social media use.

Future action by HRC could include requesting a copy of WPD's social media policy for HRC review and collaboration with WPD in line with HRC's duty to review existing policies of city departments and provide its comments as outlined in the City Ordinance

FINDING 24: COMMUNITY MEMBERS CONTINUE TO EXPRESS CONCERNS ABOUT THE WPD'S ATTITUDES ABOUT, AND TREATMENT OF, CITIZENS DURING DAILY INTERACTIONS.

Recommendation 24.1. The WPD should expand its fair and impartial and community-oriented policing training curriculum for all officers in collaboration with the community.

24.1.1 Enhance and update the existing curriculum to incorporate more comprehensive training on fair and impartial policing practices.

24.1.2 Deliver this revised curriculum to recruits, ensuring that they receive annual refresher training during their in-service period.

HRC Requests Related to Finding 24

Pursuant to recommendations 24.1, 24.1.1 and 24.1.2, HRC respectfully requests a copy of this updated fair and impartial community-oriented policing training once it's complete, and invites WPD to reach out to HRC collaborate on the development of an updated training curriculum

FINDING 25: THERE ARE NO FORMAL MECHANISMS TO REGULARLY GATHER COMMUNITY INPUT ON WPD POLICING STRATEGIES, PRIORITIES, OPERATIONS AND CURRENT PRACTICES.

Recommendation 25.1: The City and the WPD should establish a citizen's advisory council (CAC) at the commander level to address specific local issues in the community.

25.1.1 Establish operating procedures of the CAC. Include oversight and reporting mechanisms for the CAC.

25.1.2 Develop clear procedures for the appointment of members. This should be completed in partnership with an outside agency.

Recommendation 25.2: The WPD should ensure that the selection process [for the CAC] is transparent and completed by an outside party.

25.2.1 Implement clear procedures for the appointment of members. This should be completed in partnership with an outside agency.

HRC Requests Related to Finding 25

Pursuant to recommendation 25.1, 25.1.1, 25.1.2, 25.2, 25.2.1, HRC respectfully requests a copy of these procedures for review once available, and further invites WPD to reach out to collaborate with HRC on the development of these procedures as needed

FINDING 26: DESPITE WPD'S EFFORTS TO CONDUCT OUTREACH AND ENGAGEMENT, THE COMMUNITY MEMBERS CONTINUE TO EXPRESS WPD IS NOT MEETING EXPECTATIONS IN GARNERING COMMUNITY INPUT REGARDING THE DEVELOPMENT AND IMPLEMENTATION OF THE BODY-WORN CAMERA PROGRAM.

Recommendation 26.1: The WPD should continue efforts toward conducting a thorough community review of its Body Worn Camera policy and program that includes community stakeholders. It should also establish a structured framework for conducting mandatory annual assessments of the BWC program.

26.1.1 Set up community forums and focus groups to gather feedback and address concerns regarding the bodyworn camera program.

26.1.2 Collaborate with key stakeholders to implement necessary adjustments to the BWC program.

26.1.3 Establish a structured system for conducting yearly evaluations of the BWC program.

HRC Requests Related to Finding 26

Pursuant to recommendation 26.1.1, 26.1.2 and 26.1.3, HRC would like to extend an invitation through the city manager to collaborate with WPD on this effort in the form of facilitating listening sessions as we have done in the past

Pursuant to Recommendation 26.1, HRC respectfully recommends that the city manager ask WPD to review its policy regarding Body Worn Cameras, and consider revising the policy to be in line with these recommendations

FINDING 27: THE WPD HAS THE OPPORTUNITY TO RESTRUCTURE THEIR COMMUNITY MEETINGS TO BE MORE COLLABORATIVE.

Recommendation 27.1 The WPD should create new opportunities to involve communities collaboratively through its community meetings.

27.1.1 Ensure that CACs and other community meetings incorporate opportunities for gathering feedback from the community regarding WPD operations.

27.1.2 Engage in dialogue with the community to gather their perspectives on collaborative approaches between law enforcement and local residents.

27.1.3 Disseminate information regarding outcomes of community meetings, including summaries of the feedback received from participants.

27.1.4 Explore methods such as posting website updates to share summarized versions of the feedback collected during these meetings.

HRC Requests Related to Finding 27

Pursuant to recommendation 27.1, 27.1.1, 27.1.2, 27.1.3, 27.1.4 HRC respectfully recommends that the city manager ask that WPD hold annual meetings, similar to the annual crime meetings currently held at WPD Headquarters, but with a community focus, and with a name reflective of its focus, such as "WPD Annual Community Engagement Meeting, and further recommends that this meeting be held off-site of WPD headquarters in an area that is easily accessible for a wide variety of community stakeholders.

HRC further recommends that the city manager provide the WPD with a copy of the HRC final report regarding Neighborhood Meeting Surveys and its subsequent recommendations that was first presented and made public in 2019.

FINDING 28: THE WPD HAS A CHALLENGE OVERCOMING LANGUAGE BARRIERS WITH LOCAL IMMIGRANT GROUPS.

Recommendation 28.2: The WPD should collaborate with the City's Diversity and Inclusion office to review and revise the existing cultural sensitivity training to reflect current issues.

28.2.1 Conduct a comprehensive review of best practices in cultural sensitivity training used by other departments and organizations.

28.2.2 Utilize the findings from the review to develop cultural sensitivity training curricula for all staff members.

28.2.3 Actively seek input from community members and W PD staff to gather valuable feedback on the value of the training curriculum.

28.2.4 Implement regular cultural sensitivity training as part of the organization's annualized training cycle, ensuring that all employees receive this important instruction.

FINDING 28: THE WPD HAS A CHALLENGE OVERCOMING LANGUAGE BARRIERS WITH LOCAL IMMIGRANT GROUPS.

Recommendation 28.1: The WPD should commit to improving language translation services to enhance communication with all immigrant groups residing in Worcester.

28.1.1 Conduct a thorough needs assessment to identify gaps in the current translation services and explore various options available to address those gaps.

28.1.2 Initiate the process of establishing a comprehensive translation solution such as acquiring a contract that addresses the identified need.

HRC Requests Related to Finding 28

Pursuant to recommendation 28.2, 28.2.1, 28.2.2, 28.2.3, 28.2.4 HRC respectfully recommends that the city manager prioritizes the hiring of a Chief Equity Officer to facilitate the implementation of each of these recommendations.

The HRC notes that this request is consistent with a motion passed at its meeting on March 25, 2004 in which it advised the City Manager that the long delay in filling key positions is undermining the ability of the HRC to fulfill its mission and respectfully asked that the City immediately fill all open positions in the Executive Office of Diversity Equity and Inclusion.

Please see HRC Memo to the City Manager, titled "Re: The Human Rights Commission's Approved Motion from the Public Meeting on March 25, 2024."

USE OF FORCE

USE OF FORCE INTERVIEW ANALYSIS

- 69% of survey respondents rated use of force training in firearms as valuable

- 76% of survey respondents rated use of force training in tasers as valuable

- Only 43% of survey respondents rated de-escalation strategies as valuable

USE OF FORCE FINDINGS AND RECOMMENDATIONS

Finding 29: The WPD collects relatively little information about use-of-force incidents and does not collect data on the race of involved community members. This hinders useful analysis of these data and does not allow for developing an understanding of any disparities in use-of-force incidents.

Recommendation 29.1: The WPD should update its use-of-force database to add additional fields, capturing demographic data about the involved community member (age, sex, and race), a unique identifier (e.g., name) for each involved community member, and additional details about the incident [such as injuries to the officer, the severity of the injury, and the reason for the use of force].

29.1.1 Identify key data fields related to use-of-force incidents to add to use of force data collection (e.g. community member demographics, officer demographics, justifications, incident description).

29.1.2 Establish standardized reporting procedures requiring officers to include all new data points in their reports.

29.1.3 Conduct training sessions aimed at promoting accurate use-of-force documentation.

HRC Requests Related to Finding 29

Pursuant to Recommendation 29.1, 29.1.1, 29.1.2: HRC respectfully recommends, as relayed in written recommendations regarding WPD Use of Force Policy discussed in the March 2024 HRC Meeting, that the WPD enhance its ability to gather data that identifies racial or ethnic disparities in such areas as use of force, traffic stops, pedestrian stops, and field contacts.

Please see HRC Memo to the City Manager, titled "Re: The Human Rights Commission's Approved Motion from the Public Meeting on March 25, 2024."

Finding 30: The WPD does not have a procedure to systematically assess use-of-force incidents, examine any racial or geographical disparities in these incidents, and develop strategies to rectify these disparities.

Recommendation 30.1: The WPD should enhance its data-reporting processes to identify potential disparities and follow up with any necessary policy or training needs.

30.1.1. Establish a formal annual evaluation process of use-of-force data and publish the findings in a report.

30.1.2 Utilize the report findings to guide revisions in department policy, training, and procedures related to addressing racial disparities in use of force.

30.1.2 Utilize the report findings to guide revisions in department policy, training, and procedures related to addressing racial disparities in use of force.

HRC Requests Related to Finding 30, Part I

The HRC reiterates its request, as passed by motion at its March 24, 2024, public meeting, that the Use of Force Policy be amended to require require the collection of (and public access to) disaggregated data on the use of force including data on officer and subject race, gender, age, and ethnicity.

The HRC further requests that a copy of the report on the annual evaluation of use of force data advised in Recommendations 30.1, 30.1.1 and 30.1.2 be shared at the 2025 annual joint meeting between WPD and HRC

HRC Requests Related to Finding 30, Part II

The HRC reiterates its request, as passed by motion at its March 24, 2024, public meeting, that the WPD Use of Force policy be amended to include a focus on preserving human life and dignity in every aspect of the policy, including a statement at the beginning of the policy.

In its motion, passed unanimously, the HRC requested that the policy be amended to included language similar to that stated in the policy section of the IACP National Consensus on Use of Force: *that it is the policy of this law enforcement agency to value and preserve human life. Officers shall use only the force that is objectively reasonable to effectively bring an incident under control, while protecting the safety of the officer and others. Officers shall use force only when no reasonably effective alternative appears to exist and shall use only the level of force which a reasonably prudent officer would use under the same or similar circumstances.*

HRC Requests Related to Finding 30, Part III

The HRC further reiterates its request, as passed by motion at its March 24, 2024 public meeting, that the WPD Use of Force policy be amended to incorporate best practice language, including language from The IACP National Consensus Policy and Discussion Paper on Use of Force, The Department of Justice Updated Use of Force Policy, The Town of Needham, MA Use of Force Policy, including

- the full section on de-escalation on pages 3-4 of the Needham use of Force Policy,
- the sections on de-escalation, use of less-lethal force and use of deadly force on pages 3-4 National Consensus Policy, including language around discontinuation of use of force, focus on minimal amount of force and use of such minimal force only when there is no other way to prevent harm, the consideration of medical conditions that might make use of force particularly dangerous, and the provision of appropriate medical care.

Please see HRC Memo to the City Manager, titled "Re: The Human Rights Commission's Approved Motion from the Public Meeting on March 25, 2024."

HRC Requests Related to Finding 30, Part IV

The HRC reiterates its request, as passed by motion at its March 24, 2024 public meeting, that the WPD Use of Force policy be amended to address concerns around use of force with LEP individuals, specifically that WPD officers used force on individuals who struggled to comprehend commands due to language barriers, and that the **policy be amended to incorporate protections around use for force for individuals with LEP and individuals with cognitive deficits and/or language processing delays,** whether those deficits or delays are due to limitations of the individual or environmental factors, such as the fact that the person may be experiencing a traumatic event or may have an altered mental status (due to injury, substance, etc.).

Please see HRC Memo to the City Manager, titled "Re: The Human Rights Commission's Approved Motion from the Public Meeting on March 25, 2024."

Finding 31: The WPD publishes its use-of-force data on the City of Worcester's website; however, it does not disclose any information regarding racial or ethnic demographics.

Recommendation 31.1: The WPD should report racial demographic information online.

Recommendation 31.1.1 Begin to actively collect new data sets related to use of force.

Recommendation 31.1.2 Develop a process to regularly post the use-of-force data to the city website.

HRC Requests Related to Finding 31

Pursuant to Recommendations 31.1, 31.1.1 and 31.1.2, HRC further recommends that quantitative data on Race gender ethnicity of both the officer and the subject involved for the purposes of data collection, be made publicly available, and released on a regular basis at predictable intervals

For further information, see HRC Memo to the City Manager, titled "Re: The Human Rights Commission's Approved Motion from the Public Meeting on March 25, 2024"

HRC Requests Related to Finding 31

Pursuant to Recommendations 31.1, 31.1.1 and 31.1.2, HRC further recommends that quantitative data on Race gender ethnicity of both the officer and the subject involved for the purposes of data collection, be made publicly available, and released on a regular basis at predictable intervals

For further information, see HRC Memo to the City Manager, titled "Re: The Human Rights Commission's Approved Motion from the Public Meeting on March 25, 2024"

COMPLAINTS AND PROFESSIONAL STANDARDS

COMMUNITY INPUT AND INTERVIEW ANALYSIS

Community Listening Sessions
- Some community members expressed concerns about the WPD's complaint-investigations process, feeling unsure about the fairness and equity of investigations.
- Major issue is lack of understanding of the investigation procedures
- Local defense council lack of understanding of process had led to strained relationship with WPD
- Community members called for changes to increase trust in transparency and effectiveness of process

Interviews Analysis
- Local stakeholders expressed belief that communication and collaboration between the HRC and the WPD could be strengthened.
- Strategies proposed included increasing the frequency of meetings, improving data preparation, and identifying long term goals for HRC-WPD collaborative efforts

DEPARTMENT DATA ANALYSIS, PART I

Online Survey of WPD Staff

- 54% of survey respondents strongly agreed that WPD's disciplinary process benefits individuals who are favored by city officials or command staff
- 43% of survey respondents strongly disagreed that the WPD has a transparent process for disciplinary actions
- Some survey respondents indicated there is not full confidence that internal affairs investigations are done impartially and that those in higher positions may not be subject to the same scrutiny as those lower in rank

DEPARTMENT DATA ANALYSIS, PART II

Document Review

- The audit team typically evaluates disciplinary data as part of racial equity audits; however, it could not include an analysis of racial disparity in disciplinary actions because of lack of data
- Complaints made by Black and Hispanic community members were more often resolved at intake versus complaints by White community members
- Audit Team recommended that WPD broaden its data collection efforts to include detailed information regarding the race of WPD officers in complaints and how complaints are resolved
- Decrease in number of complaints over 5 years (2017-2021) could indicate fewer complaints or could indicate lack of confidence in process.
- Distribution of complaints against WPD staff broken down by the race of the officer (2017-2021) did not appear to deviate significantly from the department demographics
- Distribution of complaint outcomes by race aligned with racial composition of department with 2 exceptions:
  - Black WPD members accounted for 15% of unfounded complaints while comprising only 5% off workforce
  - Asian WPD members accounted for 5% of unfounded complaints while comprising only .5% of workforce

COMPLAINTS AND PROFESSIONAL STANDARDS
FINDINGS AND RECOMMENDATIONS

FINDING 32: BOTH THE WPD STAFF AND COMMUNITY STAKEHOLDERS PERCEIVED BIAS AND FAVORITISM IN HOW COMPLAINTS AND DISCIPLINARY ACTIONS ARE HANDLED.

Recommendation 32.1 The WPD should engage in formal conversations with the City of Worcester to discuss the establishment of a civilian oversight body.

32.1.1. Establish a working group to investigate potential models of Civilian Police Oversight Functions.

A working group consisting of representatives from the City Manager's Office, Human Rights Commission, City Council and WPD

32.1.2. Work with the City of Worcester to organize public meetings to gather input from residents on various options for Civil Oversight.

32.1.3. Work with the City of Worcester leadership to establish a plan for the Civilian Police Oversight entity.

HRC Requests Related to Finding 32

Pursuant to Finding 32, the HRC reiterates its request that City Manager facilitate direct communications between the HRC and the WPD to improve collaboration in the review and revision of WPD policies.

For further information, see HRC Memo to the City Manager, titled "Re: The Human Rights Commission's Approved Motion from the Public Meeting on March 25, 2024"

FINDING 33: THE WPD'S CURRENT BOPS DATABASE DOES NOT COLLECT FIELDS THAT WOULD ALLOW FOR MORE DETAILED ANALYSIS OF THE COMPLAINT PROCESS.
WPD SHOULD EXPAND DATA COLLECTION FIELDS TO INCLUDE THE COMPLAINT NARRATIVE, SEVERITY OF THE ALLEGATION, SPECIFIC CORRECTION ACTION TAKEN.

Recommendation 33.1. The BOPS should expand on the data that it collects related to racial disparities, enabling it to conduct more extensive analyses. should consider adopting new feedback systems that enable more officers to contribute their insights regarding department policies, procedures and practices related to DEI.

33.1.1 Conduct a review of existing data collection fields to identify missing and incomplete data points. This could include the race of the officer, complaint summary, severity level, and response.

33.1.2 Establish protocols for collecting, analyzing and reporting on the new data points.

HRC Requests Related to Finding 33, Part I

Pursuant to Finding 33, the HRC reiterates its request that the WPD or the City Manager provide a status report on how the BOPS will work with the Division of Investigations within the EODEI on matters of joint interest and/or oversight.

The HRC further reiterates its request that the City Manager direct the WPD to provide a link on its own website to the part of the POST Commission website concerning decertification and discipline information.

For further information, see HRC Memos to the City Manager, titled "Re: The Human Rights Commission's Approved Motion from the Public Meeting on February 26, 2024" and "Re: The Human Rights Commission's Approved Motion from the Public Meeting on March 25, 2024"

HRC Requests Related to Finding 33, Part II

Pursuant to Finding 33, the HRC reiterates its outstanding requests that the City Manager release to the Worcester HRC:

- the full investigation reports for all BOPS complaints for the past year (2023) involving criminal conduct, unnecessary force, discourtesy, improper dissemination of information, improper associations and dealings, conduct unbecoming, bias free policing, use of force, handcuffs and restraints, K9 guidelines, handling evidence/property, racial profiling, handling of prisoners.
- the full investigation reports for the 12 cases involving sustained allegations that were brought to POST's attention in 2022 and for the remaining 31 cases involving unsubstantiated findings.
- the full investigation reports for all hate crime incidents that took place in years 2022 and 2023.

For further information, see HRC Memo to the City Manager, titled "Re: The Human Rights Commission's Approved Motions Regarding Altered Information Requests for the Worcester Police Department and the City Solicitor's Office" dated October 17, 2023, and the Minutes of May 6, 2024, HRC Meeting and subsequent memo to the City Manager relaying the Human Rights Commission's Approved Motion from said meeting.

FINDING 34: THE WPD'S COMPLAINT PROCESS DOES NOT REQUIRE COMMUNITY MEMBERS TO BE INVOLVED IN THE REVIEW OF THE BWC FOOTAGE.

Recommendation 34.1: To enhance transparency, the WPD should incorporate the review of BWC footage into its formal policy and process for reviewing and resolving complaints.

34.1.1 Establish protocols for the systematic use of BWC footage in the complaint investigation and resolution process.

34.1.2 Regularly assess and refine the effectiveness of BWC integration into the complaint investigation and resolution process.