Bias-Free Policing

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The IACP Law Enforcement Policy Center creates four types of documents: Model Policies, Considerations Documents, Concepts & Issues Papers, and Need to Know one-page summaries. Typically, for each topic, either a Model Policy or a Considerations Document is created, supplemented with a Concepts & Issues Paper. This file contains the following documents:

- *Model Policy*: Provides police agencies with concrete guidance and directives by describing in sequential format the manner in which actions, tasks, and operations are to be performed.

- *Concepts & Issues Paper*: Designed to provide context and background information to support a Model Policy or Considerations Document for a deeper understanding of the topic.

Model Policy

Bias-Free Policing

I.   PURPOSE

The purpose of this policy is to emphasize this agency's commitment to fair and bias-free treatment of all people and to clarify the circumstances in which agency personnel may consider specified characteristics when carrying out duties. Fair and bias-free policing enhances legitimate law enforcement efforts and promotes trust within the community.

II.   POLICY

People having contact with agency personnel[1] shall be treated in a fair, impartial, bias-free, and objective manner, in accordance with law, and without consideration of specified characteristics as defined in this policy.[2]

III.   DEFINITIONS

Biased Policing: Discrimination in the performance of law enforcement duties or delivery of police services, based on personal prejudices or partiality of agency personnel toward classes of people based on specified characteristics.[3]

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

Police Services: Sometimes referred to as community caretaking functions, these are 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 welfare checks; death notifications; public assistance to persons who may be lost, confused, or affected by mental or physical illness; traffic control; medical emergencies; lifesaving services; crime prevention; public information; and community engagement.

Specified Characteristics: For the purposes of this policy, real or perceived personal characteristics, to include but not limited to race, ethnic background, national origin, immigration status, gender, gender identity/expression, sexual orientation, religion, socioeconomic status, age, disability, or political affiliation.

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[1] The term "personnel" is used throughout this document. However, agencies should consider whether sworn, civilian, or reserve officers, volunteers, interns, cadets, explorers, or any individual engaged in agency-sponsored mentoring activities should be included.

[2] For additional discussion, to include procedures for ensuring employees are adhering to the guidance found in this document and for responding to alleged or actual violations of this policy, please refer to the IACP Policy Center documents on Standards of Conduct and Investigation of Allegations of Employee Misconduct available at https://www.theiacp.org/policycenter.

[3] Agencies should be prepared to recognize all forms of bias in the delivery of police services, whether the bias is based on prejudice towards specified characteristics, nepotism and favoritism, or other factors.

IV. PROCEDURES

A. Fair and Impartial Treatment

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

2. Agency personnel shall take equivalent enforcement actions and provide bias-free services to all people in the same or similar circumstances. This does not mean that all people in the same or similar circumstances must be treated identically. Reasonable concessions and accommodations may be, and sometimes should be made, for example when dealing with people with disabilities, injury, or illness.

3. Agency personnel may only consider specified characteristics when credible, timely intelligence relevant to the locality links a person or people with a specified characteristic(s) to a particular unlawful incident, or to particular unlawful incidents or criminal patterns.[4]

4. Restrictions on the use of specified characteristics do not apply to law enforcement activities designed to strengthen the agency's relationship with its diverse communities.

B. Compliance

1. Where appropriate, agency personnel are encouraged to intervene at the time the biased policing incident occurs. Agency personnel who witness or who are aware of instances of biased policing shall report the incident to a supervisor.

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 to indications that biased policing is occurring.

   b. Respond to violations of this policy with training, counseling, discipline, or other remedial intervention as appropriate to the violation.

   c. Ensure that those who report instances of biased policing are not subject to retaliation.

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 annually, a summary of biased-policing complaints should be provided to the chief executive or their designee.

C. Training

All agency personnel will receive basic and periodic in-service training and, where deemed necessary, remedial training on subjects related to fair and bias-free policing, to include legal aspects and the psychology of bias. Agencies should test the impact of their training on changes in officers' attitudes, knowledge, and behavior, and confirm that the training is having the intended effect.[5] If the training is found not to have the intended impact, or produces unintended consequences, alternative training or retraining should be considered.

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[4] Agencies may also wish to consider utilizing the following, alternative language: Agency personnel shall not consider specified characteristics when performing law enforcement duties or delivering police services except when such characteristics are part of a specific subject description.

[5] This can be accomplished through partnerships with academic institutions familiar with training evaluations.

Every effort has been made by the IACP Law Enforcement Policy Center staff and advisory board to ensure that this document incorporates the most current information and contemporary professional judgment on this issue. However, law enforcement administrators should be cautioned that no model policy can meet all the needs of any given law enforcement agency. In addition, the formulation of specific agency policies must take into account local political and community perspectives and customs, prerogatives, and demands; often divergent law enforcement strategies and philosophies; and the impact of varied agency resource capabilities, among other factors. Readers outside of the United States should note that, while this document promotes procedures reflective of a democratic society, its legal basis follows United States Supreme Court rulings and other federal laws and statutes. Law enforcement administrators should be cautioned that each law enforcement agency operates in a unique environment of court rulings, state laws, local ordinances, regulations, judicial and administrative decisions, and collective bargaining agreements that must be considered and should therefore consult their legal advisor before implementing any policy.

Concepts & Issues Paper	Updated: January 2020

Bias-Free Policing

I. INTRODUCTION

A. Purpose of the Document

This paper is designed to accompany the Model Policy Bias-free Policing established by the IACP Law Enforcement Policy Center. This paper provides essential background material to provide deeper understanding of the developmental philosophy and implementation requirements for the model policy. This material will be of value to law enforcement executives in their efforts to tailor the model to the requirements and circumstances of their communities and agencies.

B. Background

For years, law enforcement professionals have faced accusations of racial profiling or biased policing. Social psychological research has facilitated the understanding of bias and prejudice, thereby helping law enforcement leaders design interventions to produce bias-free policing.

Social psychologists originally thought there was just one form of prejudice; now labeled "explicit bias." With explicit bias, individuals link groups (e.g., groups based on gender, race/ethnicity, sexual orientation) to negative stereotypes. Those stereotypes impact the person's perceptions and behavior, producing discriminatory behavior that is deliberate. Racism is an example of explicit bias. Social psychologists later discovered "implicit bias" as a second way that bias might manifest. Through implicit bias, individuals link groups to stereotypes, but it is not necessarily expressed in outward hostility toward those groups. As with explicit bias, stereotypes can impact perceptions and behavior, producing discriminatory behavior. A key difference, however, is that individuals are not consciously aware of implicit biases. Implicit biases can manifest in people who, at the conscious level, reject biases, stereotypes, and prejudice. The discovery of implicit bias showed that even well-intentioned people have biases that impact their perceptions and behavior.[1]

Research has found that implicit bias impacts everyone, with specific studies showing bias manifesting among members of various professional groups, such as doctors, other health professionals, medical students, educators,

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[1] For an overview and reviews of recent research, see the *State of the Science: Implicit Bias Reviews* produced annually by the Kirwan Institute for the Study of Race and Ethnicity at Ohio State University, found at http://kirwaninstitute.osu.edu/researchandstrategicinitiatives/implicit-bias-review/

judges, and lawyers.[2] Research has also addressed implicit biases specifically in law enforcement professionals; such biases can be based on race, gender, socio-economic status, gender identity, or other characteristics of individuals.[3]

The expanded, science-based understanding of bias can help negate the polarizing views that have impacted police-community relations and can assist in bringing law enforcement and community members together around a common understanding of the issue. Through increased understanding of the nature of bias, law enforcement and community members can recognize that bias in policing is sometimes unconscious and inadvertent.

Increased knowledge on the topic can also guide agencies in their efforts to produce fair and bias-free policing. Agency leaders need to focus those efforts on both types of biases (explicit and implicit). Despite efforts to prevent it, agency personnel[4] with explicit biases can and do make their way into agencies. In response, agencies must identify these individuals and hold them accountable for discriminatory behavior, with sanctions up to and including termination. However, agency leaders should also recognize that even their most exemplary employees may engage in behavior influenced by implicit bias. This fact results in the need to adopt a comprehensive strategy to promote fair and bias-free policing.

C. Definitions

Biased policing is defined herein as discrimination in the performance of law enforcement duties or delivery of police services, based on personal prejudices or partiality of agency personnel toward classes of individuals based on specified characteristics.[5] Conversely, *fair and bias-free treatment* refers to conduct of agency personnel wherein all people are treated in the same manner under the same or similar circumstances irrespective of specified characteristics.

Police services, while sometimes referred to as community caretaking functions, are 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 welfare checks; death notifications; public assistance to persons who may be lost, confused, or affected by mental or physical illness; traffic control; medical emergencies; lifesaving services; crime prevention; public information; and community engagement.

"Police services" are specifically referenced to ensure that agencies promote fair and bias-free policing across all activities. A key aspect of a fair and bias-free policing policy is to convey to personnel when it is and is not acceptable for them to use specified characteristics when making decisions. Some agencies only apply their fair and bias-free policing policy parameters to an enforcement-based subset of police activities, such as detentions, arrests, and searches. It is recommended, however, that agencies apply their directives, not just to activities focused on enforcing the law, but also to those that reflect positive police services.

Specified characteristics refer to real or perceived personal characteristics, to include but not limited to race, ethnic background, national origin, immigration status, gender, gender identity/expression, sexual orientation, religion, socioeconomic status, age, disability, or political affiliation. 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 employees. There is no single "correct set" of characteristics within a fair and bias-free policing policy, and the list an agency adopts might depend in part on the demographics and characteristics of a jurisdiction as well as its applicable laws and regulations.

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[2] See e.g., Hirsch et al., (2015). The interaction of patient race, provider bias, and clinical ambiguity on pain management decisions. *The Journal of Pain*, 16(6): 558–568. Okonofua, J.A., & Eberhardt, J.L. (2015). Two strikes: Race and the disciplining of young students. *Psychological Sciences*. Richardson, L.S. & Goff, P.A. (2013). Implicit racial bias in public defender triage. *The Yale Law Journal*, 12(8): 2626–2649.

[3] See e.g., Fridell, L.A. & Lim, H. (2016). Assessing the racial aspects of police force using the implicit and counter bias perspectives. *Journal of Criminal Justice*, 44: 36–48. Kahn, K.B. et al., (2016). Protecting whiteness: White phenotypic racial stereotypicality reduces police use of force. *Social Psychological and Personality Science*, 7(5): 403–411.

[4] The term "personnel" is used throughout this document. However, agencies should consider whether sworn, civilian, or reserve officers, volunteers, interns, cadets, explorers, or any individual engaged in agency-sponsored mentoring activities should be included.

[5] Agencies should be prepared to recognize all forms of bias in the delivery of police services, whether the bias is based on prejudice towards specified characteristics, nepotism and favoritism, or other factors.

Agencies should be selective, however, as it is inadvisable for an agency to adopt a list that is too long to be meaningful and memorable.

D. Importance of Policy

A fair and bias-free policing policy is a critically important element of an agency's strategy to addressing bias. It should serve as the foundational vehicle to convey the agency leadership's commitment to fair and impartial policing. In addition, a policy can augment training by informing personnel when it is and is not acceptable for specified characteristics to play a role in decision-making.

II. DEVELOPING A COMPREHENSIVE FAIR AND BIAS-FREE POLICING STRATEGY

Adopting a policy is only one component of a comprehensive fair and bias-free policing strategy. Other strategies include (a) the leadership message, (b) recruitment and hiring, (c) supervision and accountability, (d) training, (e) measurement/assessment, (f) operations, and (g) community outreach.[6]

A. Leadership

The leaders within an agency must convey to both personnel and community members their commitment to fair and bias-free policing. Agency leaders should recognize that overarching statements indicating there is no biased policing within the agency are ineffective. A much more constructive message recognizes the moral and constitutional imperative of fair and bias-free policing, conveys the commitment on the part of the agency to continuously promote fair and bias-free policing, and presents information regarding the ways the agency is pursuing the ideals of fair and bias-free policing through the adoption of a comprehensive strategy.

B. Recruitment and Hiring

With regard to personnel recruitment, law enforcement leaders have long recognized the value of, and geared their efforts toward, soliciting applications from individuals who reflect the diversity of their communities. The advantages of these efforts are as follows: "having a department that reflects the community it serves helps to build community trust and confidence, offers operational advances, improves understanding and responsiveness, and reduces perceptions of bias."[7] Furthermore, when officers identifying with minority groups are deployed to neighborhoods reflecting their identity, they may feel more connected to the citizens they are policing, which could increase empathy and strengthen positive police-community engagement.[8] In addition to recruiting for diversity, agencies should utilize the science of bias to guide their attempts to hire people who will provide police services in an unbiased fashion and should guard against the human biases that can impact managerial decisions, including those linked to hiring.[9]

C. Training

Modern training on this topic is geared toward implicit bias awareness and is a key component of an agency's efforts to produce fair and bias-free policing.[10] Agencies should consider available research regarding effective training

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[6] Fridell, L.A. (2017). *Producing bias-free policing: A science-based approach*. New York, NY: Springer Publishing and the George Mason University Center for Evidence-Based Criminology; Glaser, J. (2015). *Suspect race: Causes and consequences of racial profiling*. New York, NY: Oxford University Press.

[7] International Association of Chiefs of Police, *A Symbol of Fairness and Neutrality: Policing Diverse Communities in the 21st Century* (2007, 10), cited in *Law Enforcement Recruitment Toolkit*, https://www.theiacp.org/sites/default/files/2018-08/RecruitmentToolkit.pdf.

[8] Miles-Johnson, T. (2019). Policing diverse people: How occupational attitudes and background characteristics shape police recruits' perceptions. SAGE Open Access. https://doi.org/10.1177/2158244019865362.

[9] Fiske, S.T., & Krieger, L.H. (2013). Policy implications of unexamined discrimination: Gender bias in employment as a case study. In Shafir, E. (Ed). *The behavioral foundations of public policy*. Princeton, NJ: Princeton University Press, pp. 52 – 74. Fridell (2017), Ibid.

[10] Fridell, L. A. & Brown, S. (2015). Fair and impartial policing: A science-based approach. *The Police Chief*, June, pp. 20 – 25.

methodologies in this area. General training should be provided to all agency employees and should include topics such as:

- the science of bias;
- how biases might manifest in police work;
- the consequences of biased policing for personnel, community members, and agencies; and
- skills and practices for producing fair and bias-free policing based on the large body of research that has identified how individuals can identify, reduce, and/or manage their own biases.[11]

Supervisors should receive bias-awareness training, augmented with guidance on how to identify and respond to individuals under their command who may be manifesting implicit or explicit bias. Additionally, supervisors should be trained to recognize how bias might influence their own operational or managerial decisions and how to speak with individuals and groups about the sensitive topic of biased policing.

Training provided to command-level personnel should discuss the issues, challenges, and promising practices linked to the various elements of the agency's comprehensive strategy to promote fair and bias-free policing. In addition to bias-awareness training, agencies should provide scenario-based judgmental training that conditions officers to focus not on demographics, but on indicators of threat (e.g., behavior).[12]

D. Supervision and Accountability

Agencies must train, prepare, and support supervisors so they will ensure impartial and bias-free policing. Further, agencies should utilize existing accountability mechanisms, such as personnel evaluations, in-car or body-worn cameras, early intervention systems, and complaint review to promote fair and bias-free policing.[13]

E. Measurement & Assessment

There have been concerted efforts in some jurisdictions to measure biased policing. Initially, these measurements were based largely on vehicle stop data collection; however, some agencies have extended measurement efforts to use of force, police contacts with the public, and other police activities. The collection and reporting of data that includes subject demographics can be an important part of an agency's efforts to promote fair and bias-free policing and how these efforts are perceived by the community. A data collection program can convey to the community a commitment to fair and bias-free policing, accountability, and transparency. These efforts, however, must be undertaken with an understanding on the part of both law enforcement and community members regarding what these data can and cannot reveal about bias in policing. While it is not difficult to show disparity where one group is disproportionately represented among people who are stopped in their vehicles or detained on the street, the real challenge for agency analysts and their social science partners is determining the causes or sources of that disparity. Concluding that "disparity" is the same as "bias" is not correct, as some portion of the identified disparity may be produced, in part, by other legitimate factors.

Although measuring biased policing is not a simple task, such efforts can be helpful for assessing the efficacy of programmatic efforts and determining if changes are needed to training, policy, and/or procedures.

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[11] See Staats, C. et al., (2016). *State of the Science: Implicit Bias Review*, 2016 Edition. Columbus Ohio: Kirwan Institute for the Study of Race and Ethnicity. Staats, et al., (2017). *State of the Science: Implicit Bias Review*, 2017 Edition. Columbus Ohio: Kirwan Institute for the Study of Race and Ethnicity.

[12] Fridell, L. (2016). Can better training solve cops' implicit biases? *Democracy Journal*, August. At https://democracyjournal.org/arguments/can-better-training-solve-cops-implicit-biases/

[13] See the IACP Policy Center documents on Early Intervention Systems available at https://www.theiacp.org/resources/policy-center-resource/early-warning-system and Investigation of Allegations of Employee Misconduct available at https://www.theiacp.org/resources/policy-center-resource/employee-misconduct.

F. Operations

Agency leaders must ensure that their operations promote fair and bias-free policing and address the perceptions of it on the part of community members. First, agency leaders should understand the increased risk of bias associated with high-discretion, crime-control-focused activities.[14] While proactive-policing activities cannot be eliminated, the associated risks of bias can and should be reduced by educating personnel on their biases. Additionally, agencies can replace "unfocused, massive enforcement efforts"[15] with focused, information-led strategies that target behaviors instead of populations. Second, law enforcement leaders should prioritize strategies that promote *both* crime and traffic control, considering the increased potential for bias in these areas, *and* police legitimacy.[16]

G. Community Outreach

Agencies' engagement of their many diverse communities is an important part of an effort to promote fair and bias-free policing and manage perceptions of bias. Virtually all agencies have programs to strengthen the relationship between the community and the agency. As part of outreach efforts, agencies should provide opportunities for employees to interact with diverse groups within the community.[17] However, these agency programs should not overshadow the importance of ensuring that every interaction between an officer and a community member reflects the elements of procedural justice.[18]

III. PROCEDURES

An agency's fair and bias-free policing policy should declare that biased policing is prohibited, convey in more detail what is meant by the term "biased policing," outline key compliance mechanisms, and specify agency training on the topic.

A. Bias-free Treatment

Agencies should explicitly prohibit biased policing whether personnel are enforcing the law or delivering police services. While bias-free policing means that personnel will, in general, treat people in similar situations the same way, policy should recognize that there are situations wherein reasonable concessions and/or accommodations should be made based on the characteristics of individuals. An officer, for example, might adopt different tactics and/or provide different services to a person with a disability, injury, or illness. Such accommodations are intended to provide better service and should therefore not be prohibited by the policy so long as the treatment is bias-free for persons in like situations.

Policy should also inform personnel when it is and is not acceptable to consider specified characteristics when making decisions associated with enforcing the law or delivering police services. There are two major models for setting the parameters on the use of specified characteristics. One model, the narrower of the two, states that personnel cannot consider specified characteristics unless the characteristic(s) is part of a specific suspect description. The second model recognizes the legitimacy of using specified characteristics that are associated with a specific suspect description as articulated in the first model but goes further in allowing the use of characteristics for making duty-

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[14] Epp, C.R., Maynard-Moody, S., Haider-Markel, D. (2014). Pulled Over: How police stops define race and citizenship. White, M.D., & Fradella, H.F. (2016). Stop and frisk: The use and abuse of a controversial policing tactic. New York: New York University Press.

[15] Obbie, M. (2015, September 3). This is a fundamentally different way of policing. *Slate*. Retrieved from
http://www.slate.com/articles/news_and_politics/crime/2015/09/meet_susan_herman_the_woman_bill_bratton_has_tasked_with_repairing_the_nypd.single.html

[16] Lum, C. & Nagin, D. (2015). Reinventing American policing: A seven-point blueprint for the 21st century. *Translational Criminology*, Fall, 2 – 5, 11.

[17] For instance, with one program, new recruits can partake in an at-length (e.g. one-week) engagement with concerned community members to learn about the characteristics of the community and the importance of understanding diverse community needs and perceptions.

[18]Mazerolle, L., Sargeant, E., Cherney, A., Bennett, S., Murphy, K., Antrobus, El., & Martin, P. (2013). *Procedural justice and legitimacy in policing*. New York, NY: Springer Publishing and the George Mason University Center for Evidence-Based Criminology. Tyler, T.R. & Huo, Y. (2002). *Trust in the law: Encouraging public cooperation with the police and courts*. New York: Russell Sage Foundation.   See also https://cops.usdoj.gov/proceduraljustice.

related decisions. Pursuant to this model, personnel can use the specified characteristics when credible, verified, and timely intelligence relevant to the locality links a person or people with a specified characteristic(s) to a particular unlawful incident, or to particular unlawful incidents or criminal patterns. The key elements of this model include:

- *Local relevance.* This element requires that the intelligence be linked to a specific, limited geographic area, such as a park, an intersection, or a neighborhood.

- *Link between the specified characteristic and a particular crime or crime category.* This requires that, in the geographically relevant area, there is a group that exhibits the specified characteristic that is linked to a particular crime (e.g., robbery) or category of crimes (drug-related crimes). The geographic parameter and the specific link between a demographic group and a crime or category of crimes are both important elements; this model does not provide license to consider a particular characteristic just because that group is disproportionately involved in criminal activity in the jurisdiction. Even if certain groups exhibiting a specified characteristic are disproportionately represented among people who commit overall crime in a jurisdiction, law enforcement professionals are not justified in treating individuals as if they represent that stereotype or generalization.

- *Credible and timely intelligence.* Any actions involving the use of specified characteristics must be linked to credible, verified, and timely information or intelligence that is not based on biases, rumor, or unverifiable reports.

- *Confluence of factors.* The use of specified characteristics in these limited circumstances does not allow for law enforcement intervention with *any person with the specified characteristic*, but rather allows personnel to add this variable to other factors (e.g., behavior, location, time of day) in making a duty-related decision. For instance, the specified characteristic might become a part of the totality of circumstances that produces reasonable suspicion to detain.

There is no general consensus as to which model is preferable. Some argue that the first model is straightforward and is relatively easy for an agency to train and enforce, while others state that the second model is necessary for effective policing. Regardless of which model an agency adopts, strict oversight is required to ensure that this directive is being appropriately followed.

Neither model allows for police intervention where an individual exhibits characteristics that are merely inconsistent with those of the general population of the geographic area. If the decision to intervene does not meet the parameters of the first or second models above, and instead is merely based on the agency personnel's belief that the person "does not belong," it is inconsistent with the agency's commitment to fair and bias-free policing. Further, such police behavior may be legally and/or constitutionally prohibited.[19] To highlight this restriction on the use of specific characteristics, agencies may elect to add a provision to their policy stating that it is biased policing if agency personnel decisions and/or actions are based on the fact that the individual's specified characteristics are different from the specified characteristics of the majority of the residents in the area in which the individual is found.

While limits on the use of specified characteristics should be established, there may be situations where an agency legitimately focuses some of its outreach activities to particular groups exhibiting certain specified characteristics because the agency's relationship with those groups needs strengthening. Agencies should recognize the value of prioritizing, for instance, attendance at community meetings and participation in other events aimed at increasing positive interactions with disenfranchised or vulnerable population groups.

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[19] In the United States, finding a legitimate Fourth Amendment basis for intervening with such "out of place" people (e.g., waiting the few minutes it takes to identify a traffic violation on the part of a driver) does not change the fact that pulling the driver over because they are demographically "out of place" arguably violates the Fourteenth Amendment provision requiring equal protection of the law.

B. Compliance

Agencies should utilize existing mechanisms for promoting personnel compliance with all applicable laws, policies, and procedures, including those relevant to promoting fair and bias-free policing. Because of the importance of fair and bias-free policing and because individuals may ignore or be unaware when they are impacted by their implicit biases, it is important that personnel be encouraged to intervene appropriately when they believe that biased policing is occurring. Clear violations, particularly deliberate ones, should be reported to a supervisor.

Supervisors should be tasked with ensuring that the individuals in their command know and understand the contents of the agency's fair and bias-free policing policy. They also must be alert and respond to indications of biased policing and work to identify and intervene with individuals who are acting upon their biases.

Agencies should track complaints of biased policing, compiling annual reports for review by the chief executive or their designee.

C. Training

Training is an important component of an agency's comprehensive strategy to promoting fair and bias-free policing. As noted previously, this should include implicit bias awareness training. Additionally, the training should include coverage of the legal aspects of this issue, to include legal requirements related to equal protection and unlawful discrimination. Agencies should provide all employees with initial and periodic training on this topic, ideally with curricula that reinforces the key principles from basic training but with new applications, methods, and advanced topics to reduce boredom and complacency. Agencies should consider using actual cases examples where officers exhibit negative or positive behaviors in relation to fair and bias-free policing. Interactive scenario-based training with officers on this topic is highly recommended. Agencies should test the impact of their training on changes in officers' attitudes, knowledge, and behavior, and confirm that the training is having the intended effect. This can be accomplished by partnering with academic institutions familiar with conducting training evaluations. If the training is found not to have the intended impact or produces unintended consequences, alternative training or retraining should be considered.