

April 30, 2020

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Subject: Toledo Police Department 2019 Bias Free Policing Administrative Review

Bias Free Policing Administrative Review

Introduction

It is the policy of the Toledo Police Department that services be delivered equitably, respectfully and free of bias in a manner that promotes broad community engagement, trust and confidence. The Toledo Police Department does not tolerate biased-based profiling and utilizes various management tools to ensure that it does not occur. Bias-based profiling is defined as the “stopping, questioning, detention, arrest, or other disparate treatment of any person based solely on their race, ethnicity, national origin, age, gender, gender expression or identity, sexual orientation, disability, religion, economic status, cultural group, limited English proficiency or any other identifiable group.”

Criminal profiling can be a useful tool for law enforcement officers and should not be confused with racial profiling. Officers should understand the difference between the two and ensure that racial profiling does not occur. Criminal profiling is based on facts that are known to the officer at the time. These facts can come from witness statements, victim statements, evidence from crime scenes, etc. Several procedures are in place to better ensure that racial, ethnic, and/or gender characteristics are not being used by officers as a basis for traffic stops and/or subject stops.

The first of these procedures is training department personnel on bias-based policing issues in the academy and during annual in-service training. The bias-based training includes topics that ensure all citizens receive fair and equal treatment and that officers are making traffic stops, field contacts, or any other formal law enforcement actions on the basis of probable cause or reasonable suspicion. Officers have also received training on implicit bias to understand how attitudes or stereotypes can affect our understanding, actions, and decisions in an unconscious manner. Secondly, officers who have had bias-based or discrimination complaints sustained against them are subject to remedial training and the department's internal disciplinary process. Lastly, it is important to note that there is an ongoing effort to identify potential training and policy issues related to ensuring fair and impartial policing which is followed by an annual review of the department's bias-based profiling policy and practices. This annual review is completed by the Accreditation Unit.

Training

The Toledo Police Academy conducts bias-based profiling training to all cadets during the "Stops and Approaches" portion of academy training. Additionally, all department personnel receive training annually on topics related to bias-based policing (i.e., cultural diversity, implicit biases, human relations, communication and de-escalation skills, etc.).

Policy & Procedure

Department Manual Directive 103.10, entitled, "Biased-Based Profiling" was written in compliance with the Commission on Accreditation for Law Enforcement Agencies (CALEA) and covers all aspects of bias-based profiling. The directive is available to the general public on the City of Toledo and the department's websites.

Inspections and Supervisory Review

Per department policy, all vehicle pursuits and incidents involving use of force are subject to several layers of supervisory review. The process includes reviewing reports, video from the officer's body-worn camera and in-car camera, and the interviewing of any relevant witnesses. If a violation of policy is discovered in the review process, the Internal Affairs Section is notified and an investigation is opened.

To further enhance the department's goal of ensuring compliance with departmental policies and procedures, randomly selected in-car and body-worn camera footage are conducted quarterly by the commander of the Inspections Unit to ensure compliance.

Citizen Complaints

All allegations of bias-based profiling by citizens are thoroughly investigated and tracked by the Internal Affairs Section. Additionally, the department uses video recording systems (in-car camera, body worn camera) to assist in the investigation of alleged bias-based profiling by officers. The commander of the Internal Affairs Section reported that there were **zero citizen complaints** of biased-based profiling in 2019.

Analysis of Traffic Stop and Field Interview Data

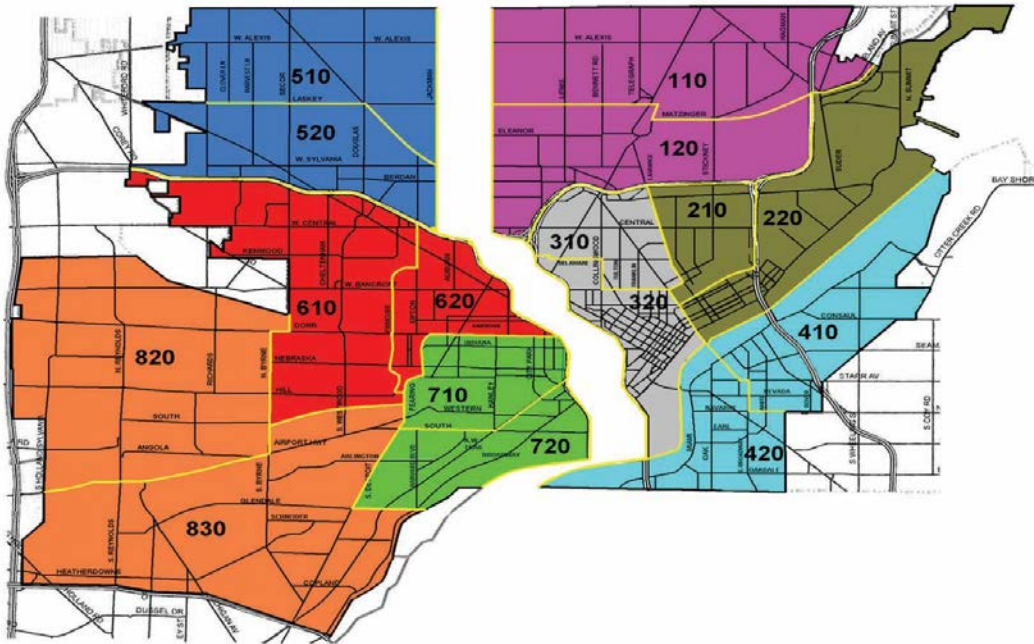
The department collects data from traffic stops by recording the disposition codes given by officers at the conclusion of an interaction. These disposition codes denote the perceived race and gender of the driver of the involved vehicle once contact is made with the vehicle's operator, as well as the actual disposition of the traffic stop (arrest, citation, or warning). In the past, yearly totals for traffic stop data would be obtained and compared to the census figures for the city of Toledo. However, aggregate percentages do not reflect racial or ethnic population density for geographical areas. Many neighborhoods are predominantly made up of one race or ethnicity. Consequently, the number of traffic stops conducted in these neighborhoods appears skewed when compared with the aggregate census data.¹ Additionally, police departments distribute personnel based on: calls for service to 911, the amount of crime that has occurred in an area, and population density. If a higher percentage of police officers are assigned to an area where the residents and drivers are predominantly one race or ethnicity, consequently there will be a higher rate of traffic stops for persons of that race or ethnicity. Therefore, additional data has been compiled for this analysis in an effort to complete a more thorough evaluation of the traffic stop/suspect stop data for the city of Toledo.

In this analysis, the National Incident Based Reporting System (NIBRS) crime rates, calls for service, shooting incidents action–response incidents, distribution of personnel, and demographic data will be collected and divided by individual police beats. This data will then be used to determine which beats (or sectors) are likely to have the highest rates of proactive enforcement. Once these areas of proactive enforcement are identified, the census data will be used to determine the demographic groups residing in the beats, and therefore most likely to be stopped. This data will then be compared with the actual traffic stop and field interview data (by beat/sector) in order to determine if those findings are similar to what could reasonably be expected, given the information provided.

¹ Racial Profiling: "What does the data mean?" Practitioner's Guide to Data Collection & Analysis (2007)

Toledo Police Beats

The department divides the city into beats, as can be seen from the following map. The majority of the information discussed in this analysis is broken down by either beats or sectors. Each sector is highlighted in a different color and then broken up into two different beats. For example, beat 110 and beat 120 (both purple), make up sector 1.



Crime Rates

The data below displays the city's 2019 violent crime rates using NIBRS. When it comes to reporting crime to the Federal Bureau of Investigations (FBI), most departments use either NIBRS or Uniform Crime Reports (UCR). This is the third year the department has used NIBRS as their reporting system; we have historically used UCR. UCR and NIBRS are both regulated by the FBI and both use the same general concepts. The biggest difference between the two reporting systems is that NIBRS reports all crimes that occurred within one single incident and UCR reports only the most severe crime that occurred within a single incident. Another difference is that NIBRS reports each victim included in an incident versus one victim per incident (UCR). NIBRS also has more crime classifications than UCR, therefore, the numbers below were adjusted to get a clearer picture of violent crime incidents.

The violent crime numbers below were collected by the Northwest Ohio Regional Information System (NORIS). They are the automated records management provider for the department. In 2019, there was a total of 2,354 violent crime incidents (Aggravated Assault, Homicide, Rape and

Robbery) reported. From the provided data, we can see that the beats where the greatest percentage of violent crime incidents occurred were beat 620, which accounted for 12.5% of the total number of incidents of violent crime, followed by beat 420 with 9.6% and beat 310 with 9.3%. This has changed from the prior year as beats 310, 710 and 620 ranked 1-3 in 2018. The lowest percentage of violent crime incidents were found in Beat 830, which accounted for only 2.5% of the total number of incidents of violent crime, followed by beat 610 with 3.2% and beats 510 and 820, both with 3.8%. Beats 510, 820 and 110 had the lowest number of incidents of violent crimes in 2018, with the lowest number shifting from beat 110 in 2018 to beat 830 in 2019.

2019 NIBRS Violent Crimes

SECTOR	BEAT	AGGRAVATED ASSAULT	HOMICIDE	RAPE	ROBBERY	TOTAL
Sector 1	110	27	0	9	69	105
	120	58	1	13	74	146
		85	1	22	143	251
Sector 2	210	99	1	9	44	153
	220	113	3	12	50	178
		212	4	21	94	331
Sector 3	310	133	2	19	66	220
	320	59	2	13	60	132
		192	4	32	126	354
Sector 4	410	61	4	18	51	134
	420	149	1	12	64	226
		210	5	30	115	360
Sector 5	510	39	0	16	35	90
	520	40	2	15	37	94
		79	2	31	72	184
Sector 6	610	36	2	3	35	76
	620	141	4	33	116	294
		177	6	36	151	370
Sector 7	710	94	7	8	52	161
	720	99	6	18	71	194
		193	13	26	123	355
Sector 8	820	34	4	15	36	89
	830	19	0	10	31	60
		53	4	25	67	149

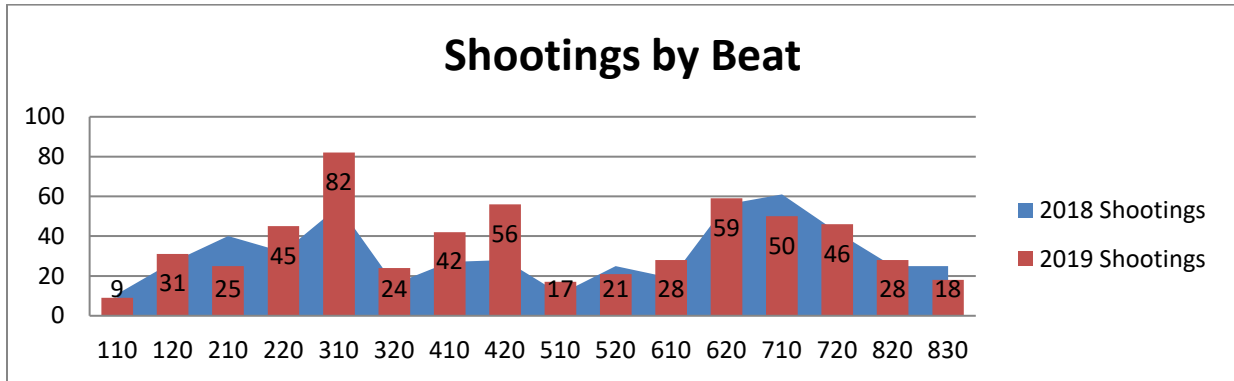
Based on this information, the department would be expected to conduct proactive police activities in the areas with the highest rates of violent crime. Therefore, the number of traffic stops and suspect stops would be expected to be higher in beats 620, 420, and 310. The department would also likely deploy a greater number of officers to these areas to carry out proactive policing activities.

Calls for Service

<u>Total Calls for Service</u>		
Beat	Calls	Total by Sector
110	7,950	20,462
120	12,512	
210	7,575	19,053
220	11,478	
310	9,172	20,778
320	11,606	
410	9,859	21,205
420	11,346	
510	9,800	20,058
520	10,258	
610	11,643	21,259
620	9,616	
710	8,937	18,501
720	9,564	
820	11,464	22,811
830	11,347	

“Calls for Service” data was collected from Communications. The sector with the most calls for service in 2019 was sector 8. The sector with the least amount of calls for service was sector 7. The next three busiest districts for calls for service were sector 6, sector 4, and sector 3. The ranking of the sectors with regard to calls for service remained fairly consistent with 2018. One factor used to determine personnel allocation is to measure calls for service by sector/beat. Based on the information in this table, it would be expected that more officers would be assigned to beats 120, 610, 320, 220, and 820. However, it is important to note that sector 8 covers a much larger geographical area than the other sectors and therefore would generate more calls for service. It should also be noted that the department’s top priorities are to respond to calls for service *and* reduce the rate of violent crime. Therefore, the NIBRS crime rate is likely a more significant factor in the number of officers assigned to a specific beat.

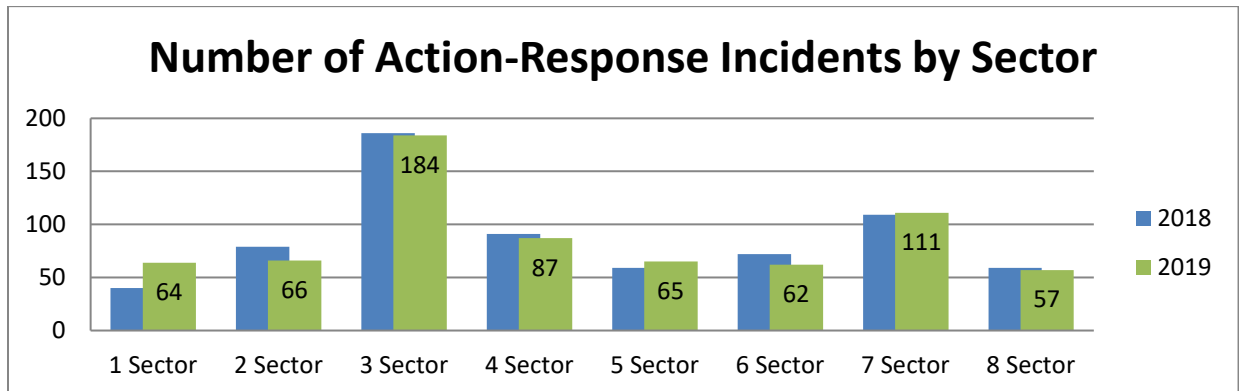
Shooting Incidents



There was a total of 581 shootings that occurred in 2019 compared to 500 in 2018, up 16%. Beat 310 had the highest number of shootings with 82 followed by beat 620 with 59. This number increased in beat 310 from 55 to 82 shootings probably due to the acquisition of gunshot detection technology (Shotspotter). Beat 620 increased from 56 in 2018 to 59 in 2019. Beats 110 and 510 had the lowest number of shootings, both with a combined total of 26.

Action – Response Incidents

Each and every time an officer uses physical control techniques to take a subject into custody, contain a situation, and affect an arrest that is beyond the mere taking control of a subject or to protect persons or property; it must be documented on a departmental Action–Response form. The following graph is a breakdown of those incidents by sector for years 2018 and 2019. Sector 3 had the highest total with 184 action-response incidents, followed by sector 7 with 111. The sectors with the lowest totals were sector 8 with 57 and sector 6 with 62. The department would likely deploy a greater number of officers to the beats in sector 3 and sector 7 to reduce chances of injury to both the officers and the subjects since these areas have a higher chance of officers going hands on with a subject. This data is consistent with 2018.



Distribution of Personnel

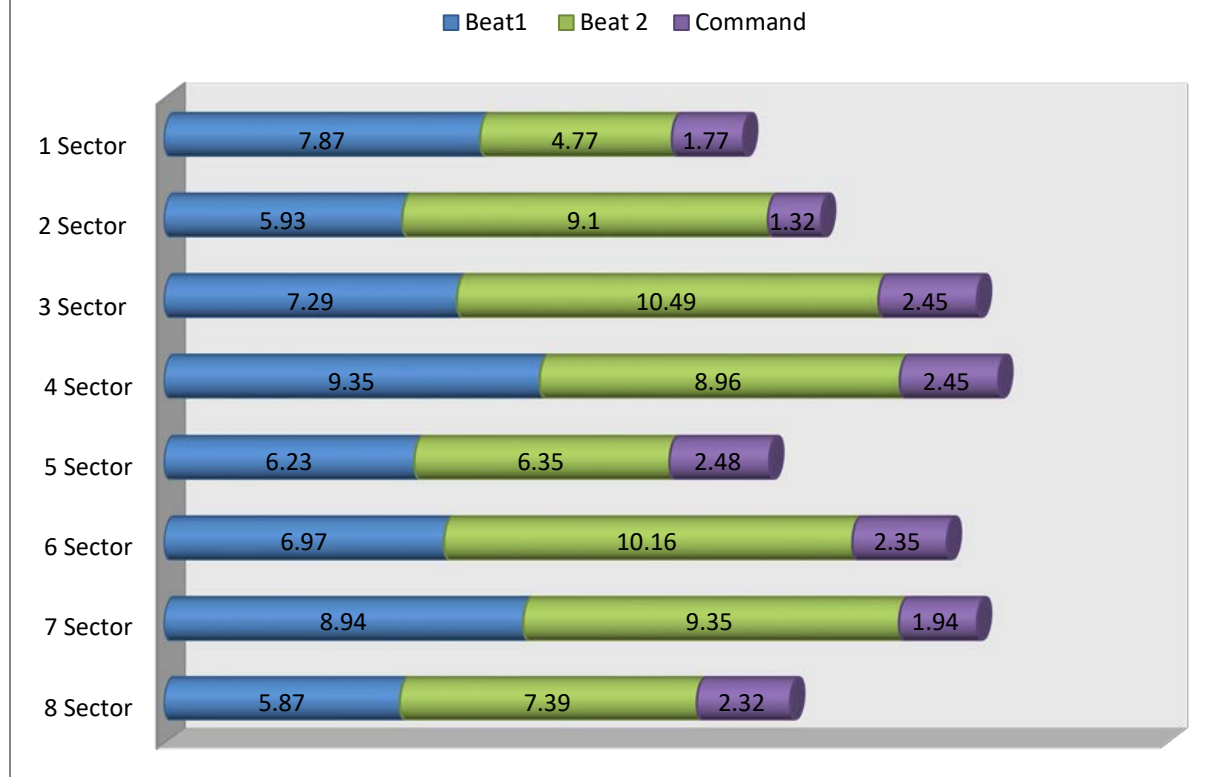
The following graph shows the distribution of personnel over a 24-hour time period for the department's district stations in 2019. The information was gathered from the daily rosters of the watch commanders and is an average from an entire month (October of 2019 for both district stations). The number of officers assigned every day for a month was collected from all shifts. A count was taken of each officer by beat, and that number was then divided to determine the average number of officers on-duty for an entire 24-hour work period; only personnel working in the Operations Division were counted (excluding officers assigned to the Traffic and Community Services Sections).

The average number of officers assigned to each beat is shown below. In addition to the officers assigned to the individual beats, the chart also displays the number of command officers who were assigned. Command officers are assigned to supervise all officers working in a sector. Officers assigned to out-of-service details (bike patrols, hot-spot areas, etc.), were not accounted for in the sector/beat assignments.

Sector 4 had the highest number of officers assigned with beat 410 having 9.35 and beat 420 with 8.96. Sector 7 was the next highest with beat 710 having 8.94 and beat 720 having 9.35. The lowest average was found in sector 5 with beat 510 having 6.23 and beat 520 having 6.35 officers per day.

In addition to these officers, the department continues to expand its use of data analyzed by the Criminal Intelligence Section. In doing so, the practice of "intelligence led policing" is used to identify "hot spots" within the city where criminal activity is used to predict future incidents of possible crimes. Departmental resources such as personnel from Operations, the Gang Task Force, the Special Intelligence Group, Vice-Narcotics Section, the Community Services Section, the Traffic Section, and task force partners (federal, state and local) are strategically deployed to those hot spots in an effort to disrupt the criminal activity. As part of their efforts, officers increase the police presence by conducting traffic stops, suspect stops, surveillance, and community outreach as a means of preventing lawbreaking in these high crime areas. Concentrating on high crime areas allows the department to be as efficient as possible in utilizing their personnel, partnerships and technology in an effort to reduce and eradicate crime in the neighborhoods of the city.

Distribution of Personnel

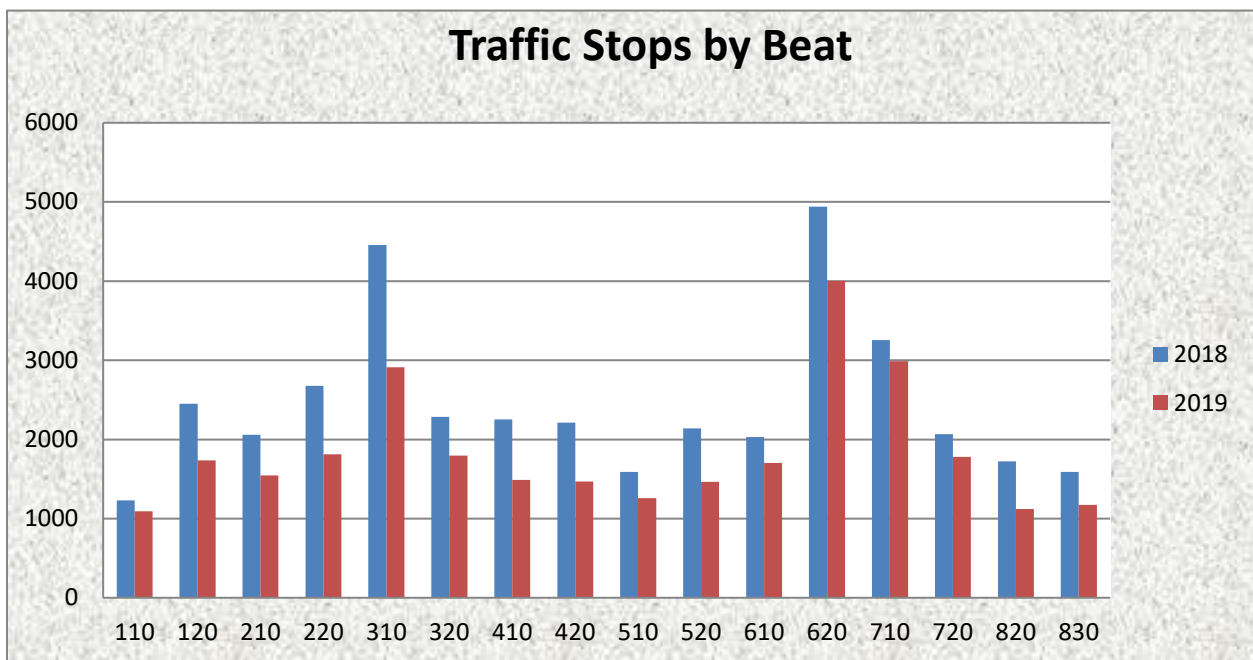


The department was designated a Public Safety Partnership (PSP) city in 2017 by the Department of Justice in an effort to reduce violent crime city-wide. PSP assisted the city in developing violent crime reduction strategies that concentrated on engaging community partners and in deploying the department's resources to designated areas of the city. Based on beat 710 having the highest number of shooting incidents in 2017 and 2018, it was the selected PSP area in 2019 (N. Detroit/Collingwood/Fernwood/Campbell). Extra patrols, investigative operations, and community service officers were utilized in this targeted area to drive down violent crime, particularly gun violence. Grant money was utilized to conduct proactive policing in this area due to heavy gang activity.

It is of value to note that beat 710 was rated number six in percentage of overall violent crime incidents in 2019 as compared to number two in 2018. It can be assumed that one of the factors that drove down the overall violent crime rate in beat 710 was a concentrated effort to target a violent crime area and dedicate the department's limited resources in this endeavor to reduce crime. The department has been under its authorized manpower strength for years and must use evidence based policing strategies to protect the citizens of Toledo.

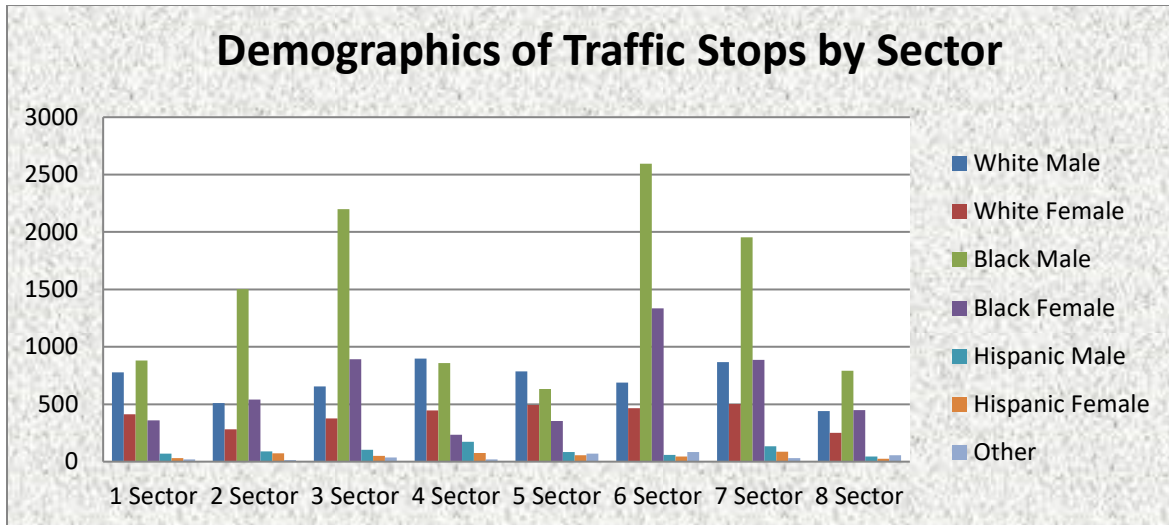
Traffic Stops by Beat

The below chart displays the number of traffic stops that have occurred in each beat in 2018 and 2019. In 2019, the largest number of traffic stops occurred in beat 620 (4,003) followed by beats 710 (2,987) and 310 (2,911). The fewest number of traffic stops occurred in beats 820 (1,120) and 830 (1,175). The total number of traffic stops were lower in 2019 (29,341) compared to 2018 (38,957). As expected, beats 620, 710 and 310 each had a large percentage of the city's traffic stops as these are three out of the top four beats in shooting incidents and beats 310 and 620 are in the top three beats for violent crime percentage.



Demographics of Traffic Stops by Sector

The next graph displays the demographics of traffic stops that have taken place in each sector. For example, of the 2,830 traffic stops that occurred in 1 Sector, 777 were of white males, 412 were of white females, 359 were of black females, and 882 were of black males.



Traffic Stops – Warnings, Citations, Arrests

Result of Traffic Stop	Stops Resulting in Warnings		Stops Resulting in Citations		Stops Resulting in Arrest	
	2018	2019	2018	2019	2018	2019
White Male	61%	53%	19%	32%	20%	15%
White Female	66%	53%	20%	35%	14%	12%
Black Male	54%	53%	24%	24%	22%	23%
Black Female	63%	57%	22%	30%	15%	13%
Hispanic Male	61%	56%	26%	29%	13%	15%
Hispanic Female	69%	56%	20%	32%	11%	12%
Other	80%	61%	16%	35%	4%	4%

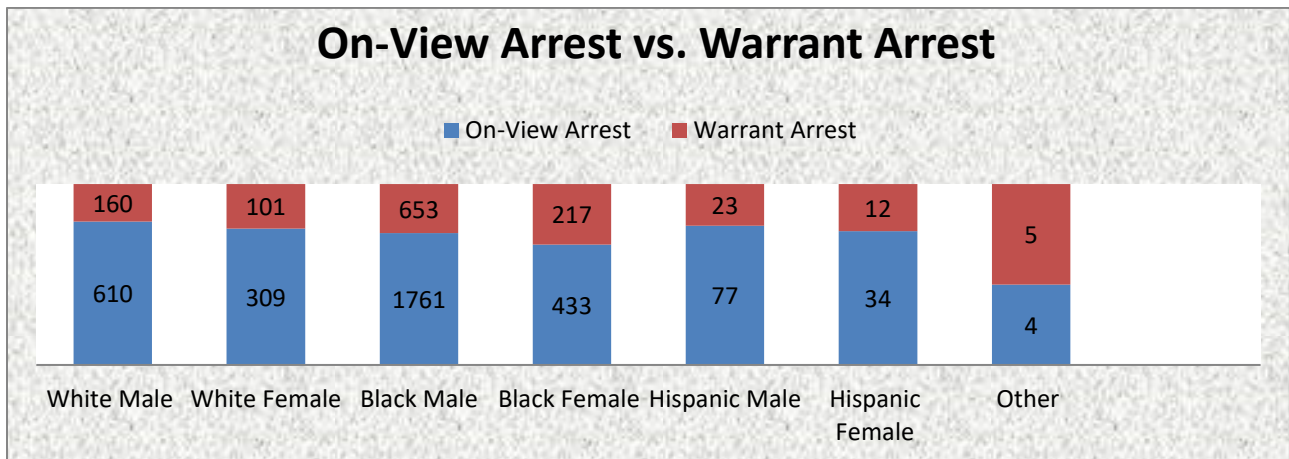
The table above displays the dispositions of traffic stops divided by race and gender. For example, the first row shows that out of all white males subjected to traffic stops in 2019, 53% received a warning, 32% received a citation, and 15% were arrested.

Police officers have discretion when it comes to issuing tickets to motorists and it appears that this discretion is being used as 54% of the time a warning is being issued to the driver of the vehicle on all traffic stops. Although warnings are given more often than not on traffic stops, it is important to note that when you compare totals from 2018 to 2019, you can see that the number of warnings given to drivers decreased in all of the demographic categories. In conjunction with the decrease in warnings given to drivers, all demographic categories showed an increase of citations issued to drivers except for black males which held steady from the prior year at 24%.

The ultimate goal for police, especially when it comes to traffic enforcement, is that the general public voluntarily complies with traffic laws. If this can be achieved by issuing a warning about what violation was committed, this will help improve police-community relations and encourage police legitimacy.

The percentage of drivers arrested in 2019 on traffic stops stayed fairly consistent from 2018. It is important to note that an “arrest” in this category does not necessarily indicate that the individual was physically arrested. For example, individuals arrested for non-violent on-view violations/outstanding warrants are issued a summons to appear in court at a later date. However, individuals issued a summons are still counted as being arrested.

It should be noted that an officer’s discretion is removed in instances where the driver has a valid arrest warrant. The table below displays the number of arrests from traffic stops, broken down by those that had a valid arrest warrant versus an on-view arrest stemming from the traffic stop. It should be noted that officers have to specifically state that the arrest was from a warrant; all others are counted as an on-view arrest.

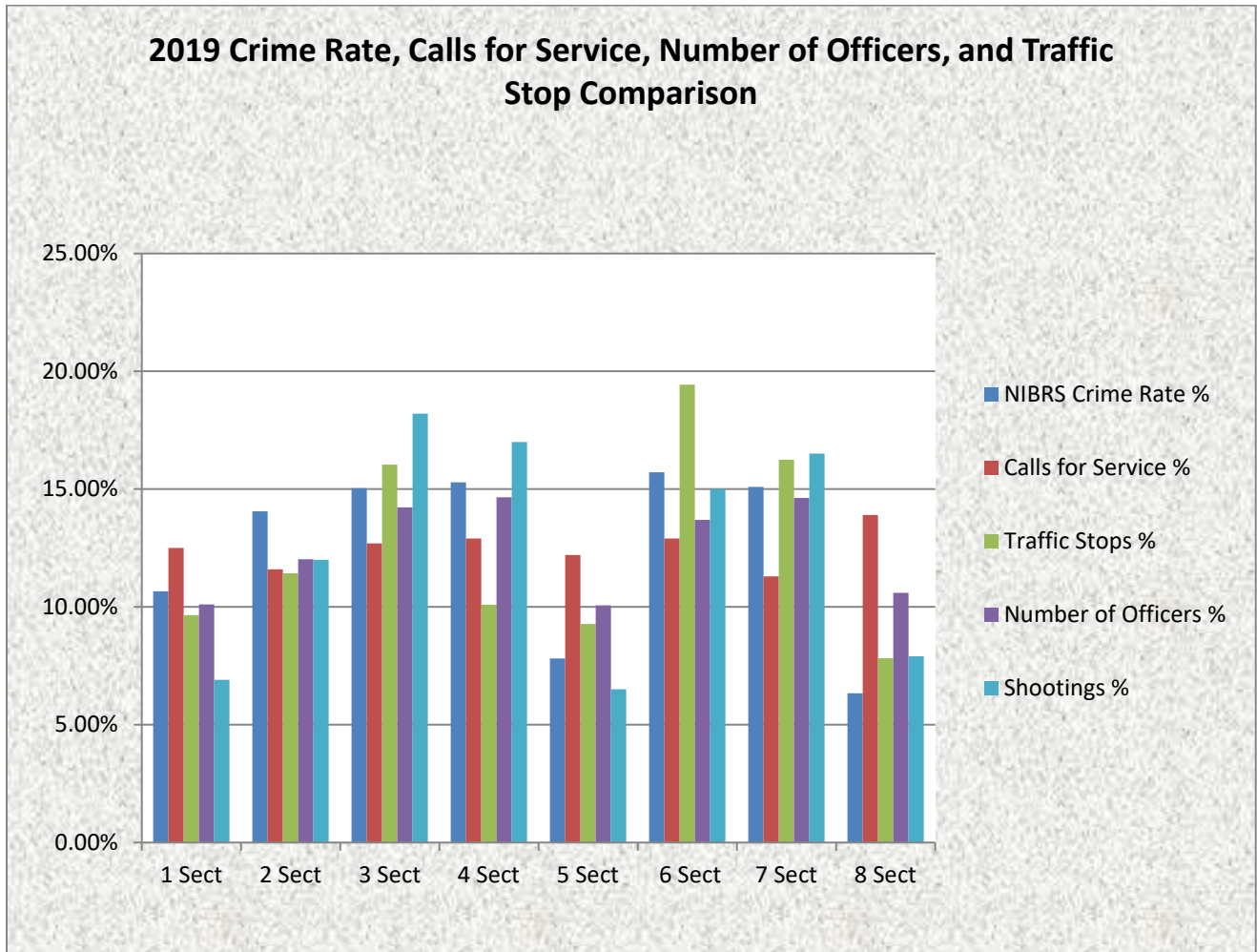


Comparison of Numbers for 2019 by Sector

The below chart displays a comparison of the percentages of calls for service, traffic stops, violent crime rates, and shootings that occurred in each sector. For example, sector 1 had 10.66% of the NIBRS violent crime rates, 12.50% of the calls for service, 9.65% of the traffic stops, 6.90% of Toledo’s shootings, and 10.11% of the officers assigned in the city for 2019.

Traditionally, it would be expected that the percentages displayed in the chart would be proportional, and the percentage of calls for service, crime rates, number of traffic stops, shootings, and officers assigned would be similar by sector. In 2019, most of the percentages appear to be proportional. Sector 3 had the highest percentage of shootings in 2019 compared

to the other sectors. Sector 6 had the highest shooting percentage in the 2018 analysis. Sectors 3, 6, and 7 had the highest percentage of traffic stops compared to the other sectors.

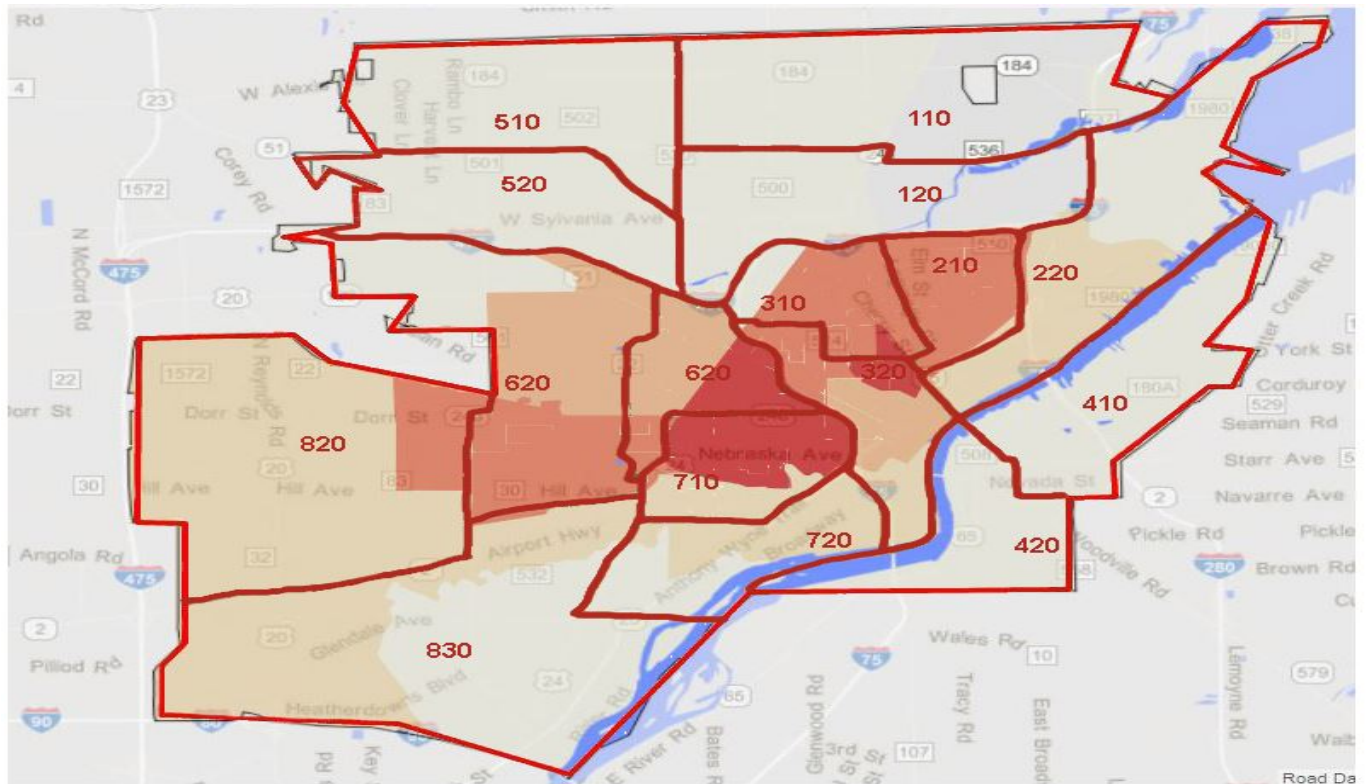


Demographic Data

The demographic data shown below, while valuable, is displayed with some apprehension. The first issue is that the data is not current. The last census was completed in 2010, making this census data nine years old. It is highly probable that the data has changed since these charts were completed. The United States Census Bureau will be conducting a new census in 2020. The second concern regarding this data is the effectiveness of using census data as a benchmark or baseline. Census data provides the actual number of residents in an area but does not account for the mobility of individuals. Also, according to a report produced by the National Organization of Black Law Enforcement Executives entitled, *Racial Profiling 'What Does the Data Mean'*, "The census is also known to have high 'miss' rates in the minority community, and like all statistical studies, the census also has an error rate." So, the possibility exists that actual demographic data in the areas most affected by this analysis may be underreported. The below demographic maps

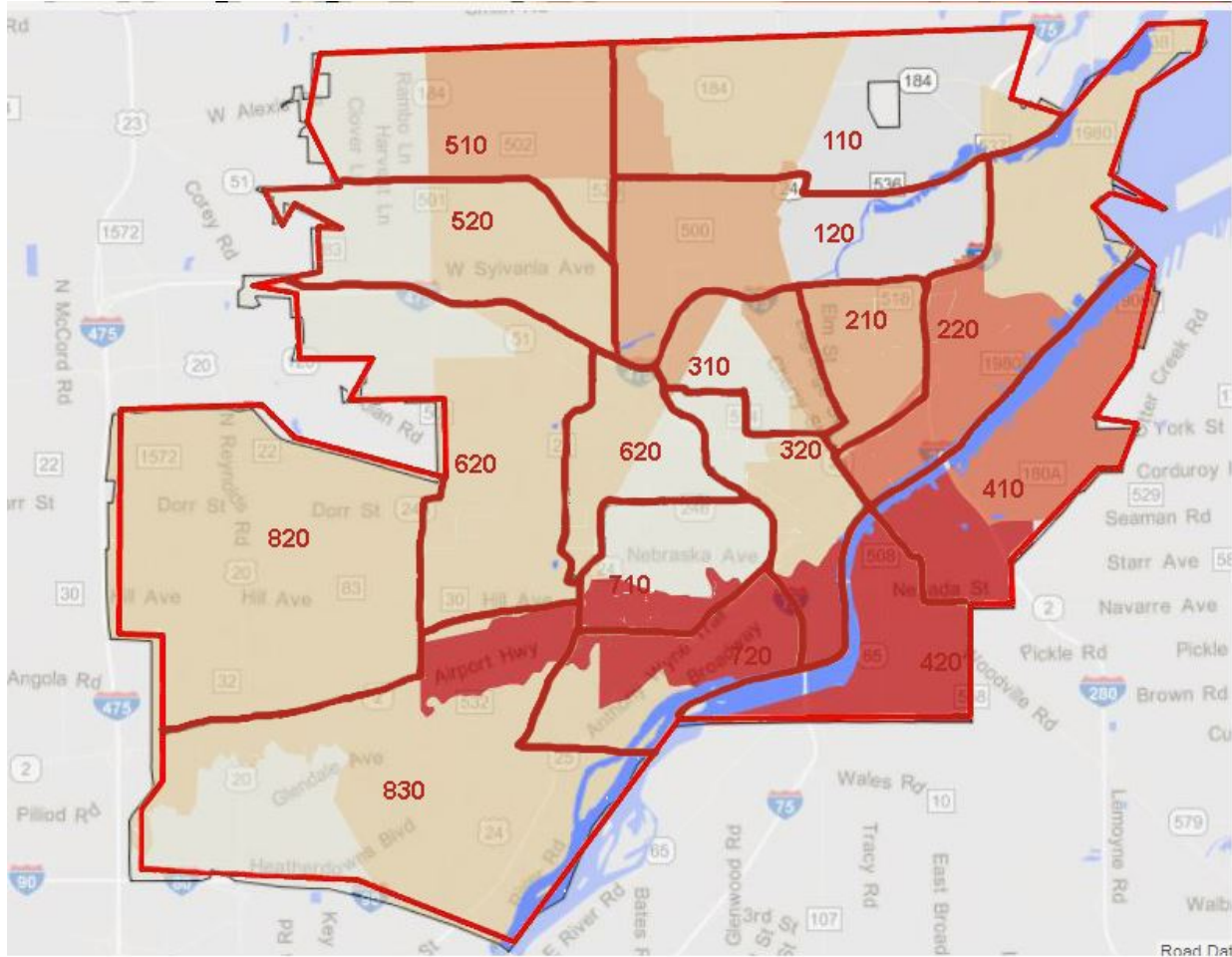
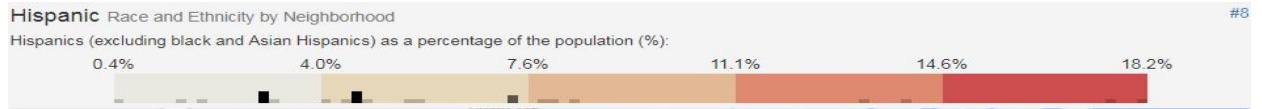
were located on StatisticalAtlas.com² based on 2010 Census data and represent the percentage of African-American, Hispanic and White residents within the city of Toledo. On each map, an outline of the Toledo Police Department beat map was overlaid. The darker shades of red indicate a higher percentage of a particular race that lives in that location.

Black Race

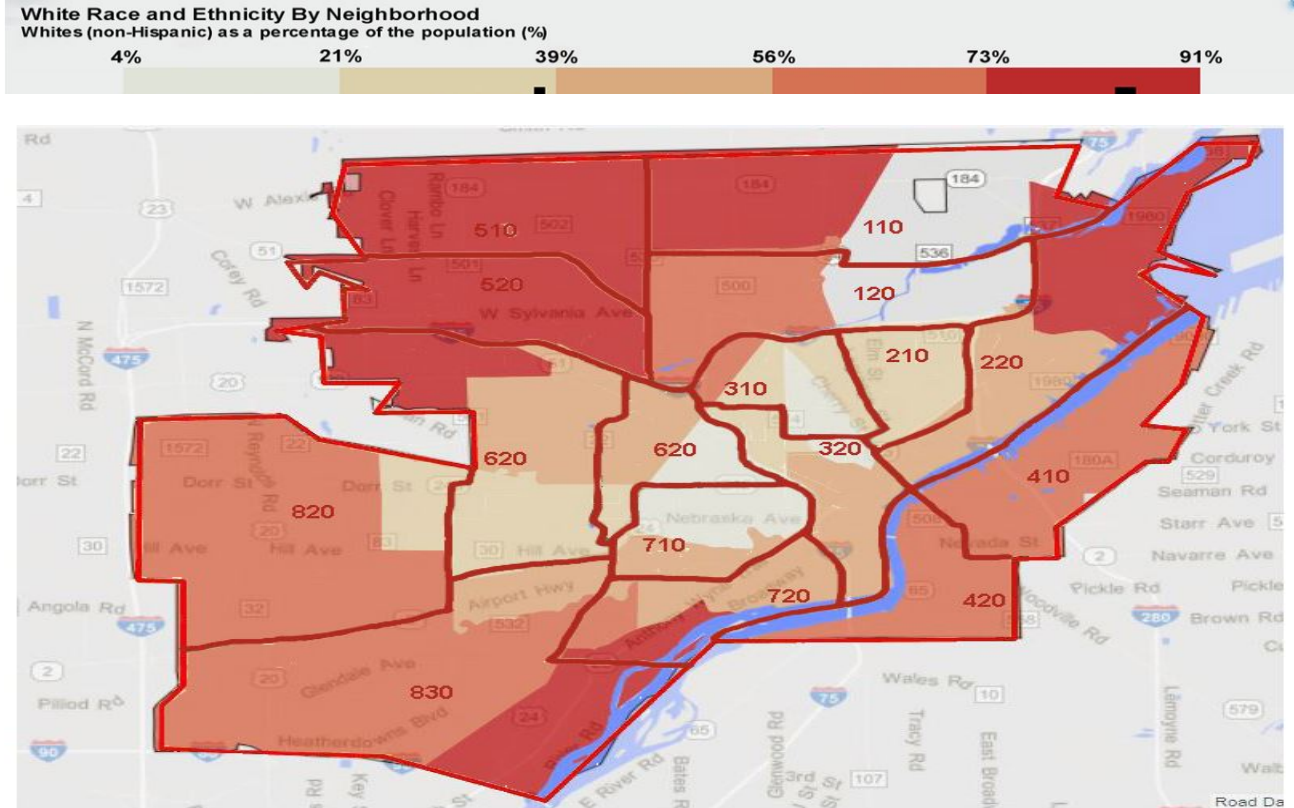


² StatisticalAtlas.com

Hispanic Race



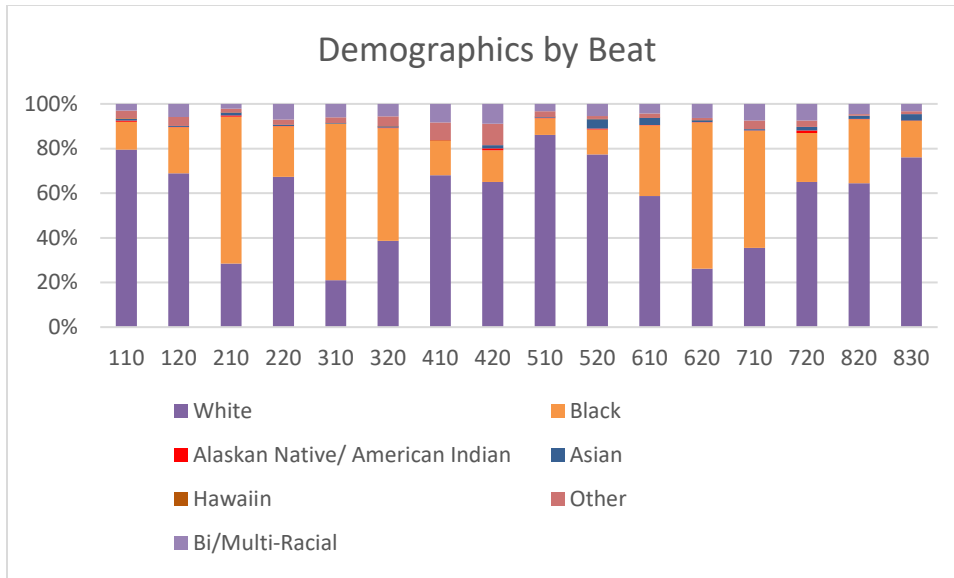
White Race



Updated Demographic Data (estimated)

In order to get an updated and potentially clearer picture of who actually resides in the sectors/beats of the city, the department's Criminal Intelligence Section took data from the United States Census Bureau ³ and broke it down into the below demographics by beat chart. The chart represents the percentage of White, African-American, Alaskan/Native-American Indians, Asian and other residents within the eight beats located in the city of Toledo. This data is based off of the 2014-2018 American Community Survey (ACS) and is a five-year estimate of the demographics of the city.

³ SOURCE: <https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-data.html>
2014-2018 American Community Survey (ACS) 5-year Estimates



Beats	110	120	210	220	310	320	410	420	510	520	610	620	710	720	820	830
Hispanic / Latino	8%	11%	7%	10%	4%	10%	18%	20%	7%	8%	4%	5%	11%	13%	4%	5%

Note: The city’s estimated percentage of Hispanic/Latinos living in the department’s beats are listed in the above chart. This information was not able to be included in the Demographics by Beat chart.

Field Interviews / Subject Stops

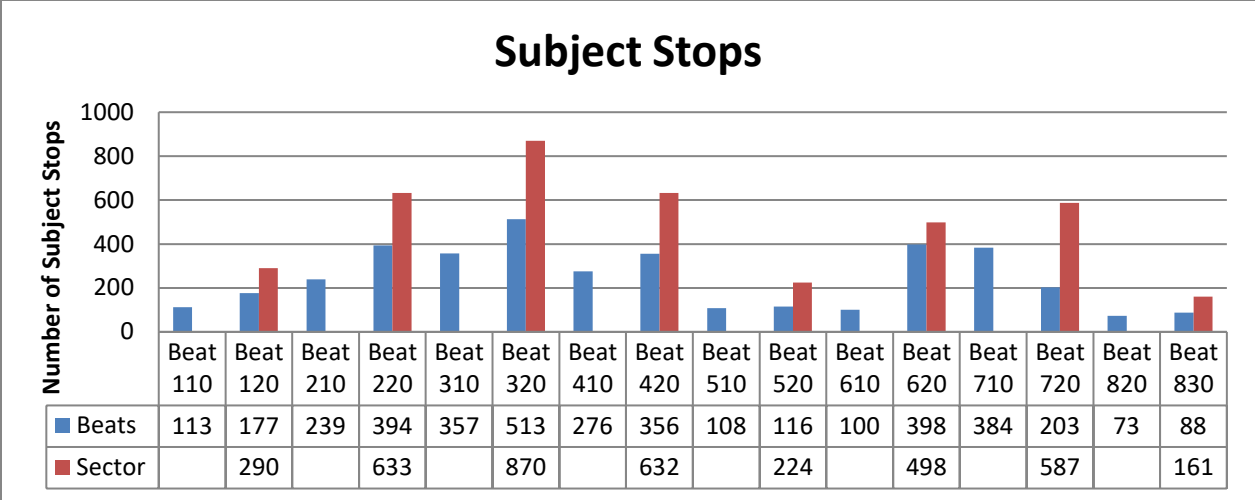
The below tables display data for subject stops and field interviews conducted by Toledo Police officers in 2019. A subject stop is when an officer stops an individual or a group of individuals while in a public place, but not in a moving vehicle. This can occur while on routine patrol or in response to a call. When an officer believes a person may have information pertaining to a crime, pattern of crimes and/or criminal suspects, or when an officer has reasonable suspicion to believe a person may have committed, may be committing, or may be about to commit a crime, they complete a Field Interview report. It is important to note that subject stop data is collected from the Tri-Tech CAD (Communications) system when an officer puts him/herself out on a subject stop. Field interview data is collected from the actual Field Interview reports that officers complete and tabulated by the Criminal Intelligence Section. Therefore, a subject stop and a field interview could be counted under both totals.

Though not represented in the table, field interview reports have been steadily declining since 2016. There were 709 less Field Interview reports completed by officers in 2019 than in 2016. The most Field Interview reports were generated in beat 420 with 77 followed by beat 410 with 54. The fewest number of reports were generated in beats 820 with 22, while 310, 510 and 520 all reported 33. Black males were the group that was recorded the most often on the reports totaling 419 (60%). This number is up 25 from 2018, followed by white males with 196 (28%). This number is down 73 from 2018. The suspect's activity most often listed by officers on the report as the reason for the interview was *suspicious activity*. *Suspected burglar/prowler/theft activity* was cited as the second most frequent reason for the interview.

**2019 Field Interviews
By Race/Gender**

	110	120	210	220	310	320	410	420	510	520	610	620	710	720	820	830	Total
White Male	16	16	1	12	7	12	20	25	18	18	6	6	2	21	5	11	196
White Female	3	6	0	2	1	0	5	5	1	1	1	2	2	1	1	0	31
Black Male	15	27	35	31	23	39	26	43	10	12	33	31	33	27	13	21	419
Black Female	1	1	3	1	0	0	1	1	2	2	1	2	2	2	1	4	24
Hispanic Male	0	1	1	0	0	0	0	2	1	0	0	0	0	0	0	0	5
Hispanic Female	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Other	1	0	2	1	2	0	2	1	1	0	0	0	0	2	2	6	20
Beat Total	36	51	42	47	33	51	54	77	33	33	41	41	40	53	22	42	
Sector Total	87		89		84		131		66		82		93		64	696	

After analyzing the data, race and gender do not appear to be factors in which individuals are stopped or how field interviews are completed by Toledo police officers. As an overall strategy to reduce criminal activity, the department typically assigns more officers to patrol identified hot spots, areas with higher calls for service, and/or areas where crime trends have been identified. As a result, more field interviews are expected to be conducted in those areas. Although property offenses are not discussed in this analysis, many of the crime series that are backed by statistical data from the Criminal Intelligence Section focuses on these types of crimes. For example, burglaries in 2019 were down over 15% from 2018 and since 2012 when the crime series started, residential burglaries are down over 70% overall (8,329 in 2011 to 2,471 in 2019). It is to be expected that when the Criminal Intelligence Section puts out a series, more field interviews, used as an investigative tool, will occur in that area, resulting in less crime and higher arrest numbers. For instance, sector 4 had eight crime series out of the total 29 crime series in 2019. This would explain why there were so many field interviews conducted in sector 4 compared to the rest of the sectors.

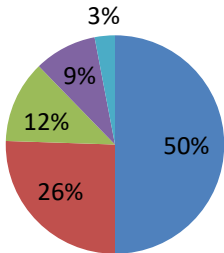


There were 3,895 occurrences where subjects were stopped by a Toledo police officer in 2019, which is down from 4,914 in 2018. Beat 320 had the most subject stops with 513 followed by Beat 620 with 398. Beat 320 had the highest percentage of officers assigned to that area which encompasses the downtown business district. A day shift two-man unit was also assigned (M-F) specifically to patrol this area. This, as well as bike patrols and officers assigned to out-of-service “bar specials” in beat 320 likely contributed to the high number of subject stops in this area. The beats with the lowest number of subject stops were 820 with 73 followed by 830 with 88. One reason for a lower number of subject stops in sector 8 could be that this sector had the highest amount of calls for service and the lowest amount of violent crime incidents and the second least amount of shooting incidents. The data supplied to the department does not break down subject stops by race and gender.

Arrests

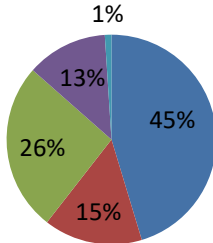
Juvenile Arrests

- Black Males
- Black Females
- White Males
- White Females
- Other



Adult Arrests

- Black Males
- Black Females
- White Males
- White Females
- Other



There was a total of 19,675 arrests made in 2019. That number is less than the number of arrests that were made in 2018. The above graphs represent the arrests made in 2019 separated by juveniles and adults, and then by race and gender. Hispanic arrests are included in the “Other” category.

Conclusion

As officers work to protect community members and their property, the department has taken great strides to ensure that individuals, with whom officers come in contact, are treated justly and without bias. This report highlights how department policy, training, inspections, supervisory review, investigations of citizen complaints, and a data driven approach work to reduce bias.

Recommendations

The Toledo Police Department should continue proactive policing to deter crime and criminal activity by showing a police presence and engaging the community in order to learn their concerns. Methods that identify areas that could benefit from an increase in proactive policing measures should continue to be used as well. With a limited amount of resources available, it is important to utilize those resources in the most efficient way possible. It appears that certain beats/sectors within the city have higher violent crime rates and/or higher calls for service than others. In response to this, the department did a lengthy internal study in 2019 with the goal of trying to determine if redistricting would distribute the geographical areas of each beat in a more equitable way (the last redistricting occurred over a decade ago). The redistricting study found that the current boundaries do in fact distribute the workload in a reasonable manner. In order to increase efficiency to an even higher level, the lines were moved slightly in sectors 6, 7, and 8 to improve the workload balance at the Scott Park District Station.

The Toledo Police Department should continue to build open and honest relationships with the public. Keeping an open dialogue with community members through events and partnerships has proven to be very beneficial. The Toledo Police Department website also provides a wealth of information to the public. Users can access a crime map to see what crime is occurring in their neighborhood. They can also report a crime anonymously. Users can also find the department goals and objectives, reports pertaining to *use-of-force*, *pursuits* and *bias-free policing*, Internal Affairs and Equal Employment Opportunity (EEO) reports, community surveys, the department manual and much more. The flow of information to the public and community outreach programs should always remain high priorities for the Toledo Police Department.

The Toledo Police Department recently implemented a new hiring process where applicants apply and take the civil service tests online. The new hiring procedure was implemented in an attempt to attract a more diverse group of applicants by both simplifying the process and making it more accessible. A police force that represents the make-up of its community is essential as is

a thorough and complete background investigation of each candidate. Hiring recruits that display traits of bias-free attitudes and an understanding of public service are vitally important. The 66th Toledo Police Academy class was hired in 2019 and graduated in February of 2020. Out of 37 graduates, 12 were females (32%). Nine of the 37 graduates were identified as Black, Hispanic or other (25%). The police department has and continues to make it a priority to recruit females and minorities to help diversify the ranks.

While there is no evidence of bias-based policing occurring within the department, the need to continuously monitor the situation is great. In an effort to improve the management of personnel, the Toledo Police Department is in the process of transitioning to an advanced police force management and early intervention system. The new system, Benchmark Analytics, enhances the ability to collect and review data in areas such as vehicle pursuits, performance evaluations, internal affairs complaints and officer training. This system will allow the Toledo Police Department to gather more comprehensive data and get a better understanding of officer and subject interactions.

The department should also continue annual training on issues relating to bias-based profiling with respect to the law on topics such as field contacts, traffic stops, and search and seizures. The department should also continue regular training officers on topics such as cultural diversity, implicit biases, and human relations and interpersonal communication skills.

Finally, it is important to note that first-line supervisors play an important role when it comes to combating bias-based policing. If an officer begins to display explicitly discriminatory behavior, the issue can be quickly and effectively addressed by a supervisor. Systems of accountability and taking corrective action when needed are vital to remain a bias free police department.