

Police Accountability Board
Policy Review Committee
29 January 2024

I. General Policy Note on Policing within JHH

An observant member of the Policy Review Committee recently raised a concern that to date, We do not recall reviewing a JHPD draft policy specifically relating to policing within the Johns Hopkins Hospital (JHH). While there will already be policy regarding Johns Hopkins security personnel within the JHH, We believe consideration should be given to drafting additional policy on JHPD officers' interactions with JHH patients, medical providers, etc.

Issues raised among committee members included the following:

- a. Policing of and policing services for JHH patients
- b. Potential Vulnerability of patients
- c. Patient (or their representative) access to JHPD policing services
- d. Role of JHPD vs JHH Security personnel
- e. JHPD interactions with medical personnel within medical care setting
- f. JHPD access to JHH restricted areas
- g. Medical records access, handling and privacy

Again, some of these areas will be covered in existing JHH security policy, but given the added authority vested in sworn police officers, clarity on these and any related issues is recommended.

II. Comments on Second Tranche of Draft Policies *(Posted November 30; Public Comment Period Closes January 29)*

Conduct & Responsibility

[104: Personal Appearance](#)

No comment (DT)

[105: Personal Use of Social Media & Electronic Devices](#)

No comment [DT]

Administrative Procedures

201: Authority, Department Organization & Command

- A) RE: "However, JHPD officers shall not take extra-jurisdictional action solely to protect property." This provision seems to be clear for urban campuses with clearly defined and/or confined spaces. It seems less clear for JHU campus areas that is so fully integrated into a patchwork of urban city streets. The provision seems to place future JHPD officers in the potentially difficult position, of seeing a property crime across the street and not being in a position to respond (Where such street is the campus area boundary). JHU Community members know that at the moment Baltimore City is going through a property crime spike, including car thefts and break-ins. In such circumstances, Will this provision actually be workable? (DT)

203: Forms Control

No comment (DT)

205: Accreditation Management

No comment (DT)

206: Fiscal Management

No comment (DT)

208: Uniforms & Equipment

- General; is there a reason **visible name plates** are not to be worn at all times? Visibility of a nameplate inspires confidence with the public that police are identifiable and are not hiding or obscuring their identity. Even if not practical at all times, this should be considered as a routine practice.

- VI. Body Amor: This section gives the impression that officers will always wear soft body armor or ballistic vest while on duty. **If so, This potentially gives a militaristic** impression to the public. Even if this is a practice in large city police departments, it really should be considered if this is the militaristic impression the JH campus police wish to present. And if there are not alternative ways to use ballistic vest when only fully necessary. (DT)

209: Fleet Management

(EH) "If the vehicle is equipped with a GPS Antenna, it will be connected to the Mobile Data Computer (MDC) and activated during vehicle operations." - could more detail be added on which vehicles are selected for GPS tracking and how that data will be used. Could that data be available to the public if requested?

210: Records Management

Could the JHPD make certain aggregated data publicly available via a dashboard about arrests? Very simple demographic data like race and gender and whether the person was a minor or a JHU affiliate. And then type of crime (broad category). Similar to the BCPD Accountability Dashboard (EH)

Could the JHPD describe their process to ensure the cybersecurity of the criminal records and other files? (EH)

[221: Media Communications](#)

No comment (EH)

[222: Clery Act Compliance](#)

When the JHPD is pushing security notifications, could there not be a description of the suspect? It was alarming for JHU students, faculty and staff to receive these when they personally matched the description of the suspect (e.g. Black male). The vague descriptions don't add any information. Instead just a brief description of the crime, the geographic area of concern and specific instructions (e.g. Be aware, avoid area, shelter in place) would be most helpful. (EH)

[230: Criminal Justice Information Systems](#)

No comment (EH)

Personnel Procedures

[301: Personnel Management](#)

Consider adding a section on mental health wellness – providing not only free counseling upon request or after a traumatic work-related event, but also offering weekly, drop-in peer counseling opportunities. The informal peer counseling should not take attendance or keep medical records so that officers may attend without concern of it impacting their future career outside JHPD (thinking of military positions which can reject applications due to use of mental health services) (EH)

Does the background check ensure that JHPD employees do not have any previous affiliation with security threat groups such as gangs or white supremacy groups? (EH)

Can JHPD offer recruitment events or incentives for officers from Baltimore city? This could allow for officers to have stronger ties to the communities they serve (EH)

[305: Training & Professional Development](#)

No comment (EH)

General comment on training, professional development, and field training programs. While these areas cover the "accepted buzz words" ref. Policing a diverse community, somehow I am less than fully convinced that lateral, or probationary officers, but particularly lateral officers coming from areas of policing with little or no diversity, will embrace these concepts simply from "Gap" and standard field training. Particularly if they do not come from a diverse community and are unfamiliar with diverse populations. **How does GAP or field training assess a lateral or probationary officer's capacity for just or fair policing?** - of course no one may have the perfect answer to this, but it should be fully considered and reflected in training as best as possible. -as one potential idea, **Consider including in GAP training, a requirement for lateral and probationary officers to meet in some forum, members of the diverse communities they will be policing, and hear directly from these, their fears and concerns regarding just and fair policing. (DT)**

[306: Field Training & Evaluation Program](#)

No comment (EH)

[312: Awards](#)

No comment (EH)

[313: Secondary Employment](#)

No comment (Elizabeth)

This appears to include prohibition on “secondary/ outside employment” that involves use of law enforcement authority. If this includes prohibition on secondary employment as off-duty security for private sector? Which appeared to be common practice some places? – If so, consider elaborating that example. [DT]

[351: Non-Punitive Corrective Action](#)

No comment (Elizabeth)

[355: Early Intervention Program](#)

No comment (Elizabeth)

Operational Procedures

[413: Diplomatic Immunity](#)

A) As someone who has in the past worked overseas with diplomatic functional immunity, I understand that this is a complex area and would be clearer if “functional immunity” were elaborated. -Consider adding language on “functional immunity” to Procedure E. Such as: “...find that criminal acts occurred in the course of official duties. (ie: functional immunity) Persons with limited criminal immunity enjoy limited or no personal inviolability for private acts performed outside their official duties.” -Consider adding “Functional Immunity” to the definitions. [DT]

[418: Behavioral Threat Assessment](#)

General comment: Is it appropriate to add procedure for dealing with individual who is assessed not to be a immediate threat?. it is likely this will be a large number of cases, and the policy seems lacking on this point, therefore. (DT)

[421: Court Orders for Protection](#)

Definitions: cohabitant – why does this definition not include roommates who do not have a sexual relationship? [MS]

Procedures 1. General. A: Recommend link to NIBRS Group A and B offenses. It appears based on these categories, the majority if not all cases would fall under the jurisdiction of the BPD, not JHPD. How do you ensure that JHPD helps facilitate the process and ensure the safety of the victim. [MS]

II. B/C: In the scenario a crime is committed that would fall into the eligibility criteria for a protective or peace order, how are the number of orders requested, declined, approved, and events with or without an order captured? [MS]

III. B. How do you ensure the safety of a victim if an order has been approved but never served to the respondent? [MS]

[422: Victim & Witness Assistance](#)

Policy Core Principles: I. Trauma Informed Response and II. Victim-Centered Support: **Would recommend stating what type of training is required and how frequently it is updated.** [MS]

VIII. Resources: Link to safeathopkins.org does not work.

XI. Training: **Recommend adding frequency of training.** [MS]

[427: Patrol Operations](#)

No comment [MS]

[429: Police Radio Communications](#)

No comment [MS]

[430: Animal Complaints](#)

No comment [DT]

No comment [MS]

[431: Administration of Nasal Naloxone](#)

No comment [MS]

[432: Automated External Defibrillators](#)

Procedures. 1. C.: **Would suggest all officers be trained in AED use as time is of the essence in cardiac arrest.** [MS]

[434: Language Access Services](#)

B. Onsite Interpreters: The need for written request beyond supervisor approval seems like an unnecessary hurdle that likely will prevent the use of in-person services when they would more than likely be indicated. **Would suggest that this process not be so cumbersome as it is within the rights of LEP persons to have access to language interpretation, free of cost.** [MS]

C. Language skilled bilingual members: **Would recommend that LSBM undergo testing to demonstrate proficiency in a language prior to using that language for communication with the public as there is some associated risk with miscommunication and the decision to use language**

services is arbitrary and left open to the officer to decide rather than formally defined based on specific contexts. [MS]

[435: Communicating with Hearing Impaired Persons](#)

No comment [MS]

[438: In-Car Camera System](#)

No comment [MS]

[439: Automated License Plate Reader](#)

No comment [MS]

[443: Collision Investigations](#)

No comment [MS]

[444: Driving Impaired & Under the Influence](#)

No comment [MS]

[445: Assistance to Roadway Users](#)

No comment [MS]

[446: Vehicle Towing & Storage](#)

No comment [MS]

[447: Parking Enforcement](#)

No comment [MS]

[464: Missing Persons Investigations](#)

III: C. if the search/investigation is limited to the JH campus, should BPD be notified immediately if the child is thought to be missing? [MS]

VIII: C. When children are thought to be exploited in criminal activities, shouldn't their interview be held by a different agency, such as the FBI who have more experience in these matters? There is a risk of psychological trauma associated with the interview process and it should be performed appropriately the first time. [MS]

[467: Evidence Collection & Preservation](#)

V. D: How do we ensure that photos taken on personal devices are stored safely or deleted in a timely manner? [MS]

[470: Field Reporting System](#)

No comment [MS]

[480: Critical Incident Response & Management](#)

No comment [MS]

[481: Active Assailant Response](#)

No comment [MS]