April 24, 2019

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Subject: Toledo Police Department 2018 Bias Free Policing Administrative Review

Bias Free Policing Administrative Review

Introduction

It is the policy of the Toledo Police Department that police services are delivered equitably, respectfully and free of bias in a manner that promotes broad community engagement, trust and confidence. 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." The Toledo Police Department does not tolerate biased-based profiling and shall utilize various management tools to ensure that it does not occur.

Criminal profiling can be a useful tool for law enforcement officers and should not be confused with racial profiling. 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. Officers should understand the difference between the two and ensure that racial profiling does not occur. The Toledo Police Department has several procedures in place to help 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 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 which is completed by the Accreditation Unit.

Police Department Training

The Toledo Police Academy conducts bias-based profiling training to all cadets during the "Stops and Approaches" portion of academy training. Additionally, the Toledo Police Department Manual requires that all department personnel receive training annually on bias-based policing. This training was conducted in 2018 as part of the mandatory winter in-service training.

Police Department Policy

Department Manual Directive 103.10, entitled, "Biased-Based Profiling" was written to be in compliance with the Commission on Accreditation for Law Enforcement Agencies (CALEA) standard 1.2.9. The directive covers all aspects of bias-based profiling: definitions, prohibitions against bias-based profiling, bias-based profiling training, corrective measures, and an annual administrative review. The directive is in the Toledo Police Department Manual, which is distributed to all sworn officers.

Bias-Based Citizen Complaints

All allegations of bias-based profiling by citizens are thoroughly investigated by the Internal Affairs Section of the Toledo Police Department. The Internal Affairs Section specifically tracks all bias-based complaints through the Administrative Investigative Management system. Additionally, the department uses video recording systems in marked police vehicles and body worn video cameras to assist in the investigation of alleged bias-based profiling by officers. The Toledo Police Internal Affairs Section reported that there were three citizen complaints of biased-based profiling in 2018. Two cases had a finding of non-sustained (unable to find

sufficient evidence to prove or disprove the allegation) and one of the cases had a finding of unfounded (investigation proved conclusively that the alleged act did not occur and/or the accused officer did not commit the act or there was no credible evidence to support complaint).

Analysis of Traffic Stop and Field Interview Data

The Toledo Police 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. 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.

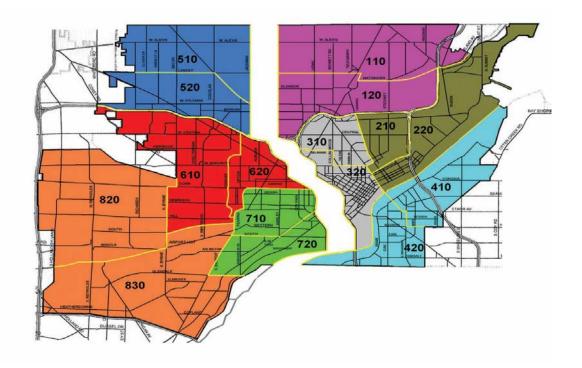
In this analysis, the National Incident Based Reporting System (NIBRS) crime rates, calls for service, action—response incidents, distribution of personnel, shootings, and demographic data will be collected and divided by police beat. This data will then be used to determine which beats (or sectors) 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.

Toledo Police Beats

The Toledo Police Department divides the city of Toledo into beats, as can be seen from the map below. The majority of the information discussed in this analysis is broken down by either

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

beats or sectors. Each sector is highlighted in a different color and then broken up into two different beats. For example, Beat 510 and Beat 520 (both blue), make up 5 Sector.



Crime Rates

The data below displays the 2018 violent crime rates for the Toledo Police Department 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 second year the Toledo Police Department has used NIBRS as their reporting system; we have traditionally 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 highest crime that occurred within a single incident. Another difference is that NIBRS reports each victim included in an incident versus one victim per incident, with UCR. NIBRS also has more crime classifications then UCR, therefore, the numbers below were adjusted to get a clear picture of violent crime incidents.

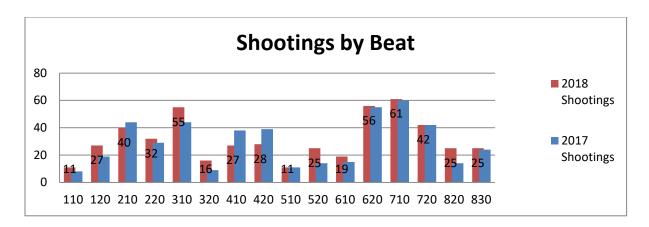
The violent crime numbers below were collected by Northwest Ohio Regional Information Systems (NORIS). They are the automated records management provider for the Toledo Police Department. From the provided data, we can see that the beats where the greatest percentage of violent crime incidents occurred were Beat 310, which accounted for 8.2% of the total number of incidents of violent crime, followed by Beat 710 with 8.0% and Beat 620 with 7.9%. Conversely, the lowest percentage of violent crime incidents were found in Beat 110, which

accounted for only 3.9% of the total number of incidents of violent crime, followed by Beat 510 with 5.0% and Beat 820 with 5.1%. This data remains consistent with 2017.

Toledo Police Department

2018 NIBRS Violent Crimes												
SECTOR	BEAT	AGGRAVATED ASSAULT	HOMICIDE	RAPE	ROBBERY	TOTAL						
Sector 1	110 120	31 48	2	12 13	28	73 101						
		79	3	25	67	174						
Sector 2	210 220	56 71	3	17 15	32 43	108 132						
		127	6	32	75	240						
Sector 3	310	79 39	6	22 20	44 45	151						
	320	118	4 10	42	89	108 259						
Sector 4	410 420	60 68	1 1	11 20	40 43	112 132						
	420	128	2	31	83	244						
Sector 5	510 520	46 46	1	17 18	29 43	93 108						
		92	2	35	72	201						
Sector 6	610	50 71	2	30	33	115						
	620	121	3	15 45	59 92	146 261						
Sector 7	710	84	5	17	42	148						
	720	58 142	3 8	23	41 83	108 256						
Sector 8	820	32	2	21	39	94						
	830	49	2	20	44	115						
		81	4	41	83	209						

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 310, 710, and 620. The department would also likely deploy a greater number of officers to these areas to carry out the proactive policing activities.



There were a total of 500 shootings that occurred in 2018 compared to 465 in 2017, up 7%. Beat 710 had the highest number of shootings with 61 followed by Beat 620 with 56. These two beats also had the highest number of shootings in 2017. Beats 110 and 510 had the lowest number of shootings both with 11.

Calls for Service

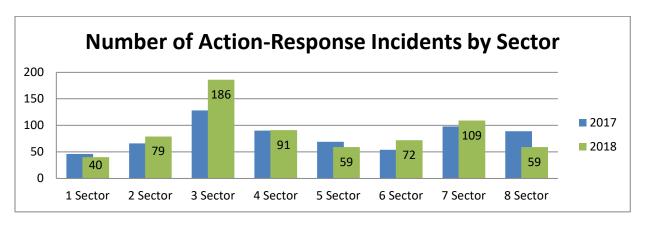
Total Calls for Service									
Beat	Calls	Total by Sector							
110	7,556								
120	12,696	20,252							
210	7,615								
220	11,092	18,707							
310	9,830								
320	12,021	21,851							
410	10,119								
420	10,979	21,098							
510	9,397								
520	9,800	19,197							
610	11,854								
620	8,790	20,644							
710	8,892								
720	9,738	18,630							
820	12,081								
830	12,427	24,508							

"Calls for Service" data was collected from Communications. The sector with the most calls for service in 2018 was 8 Sector. The sector with the least amount of calls for service was 7 Sector. The next three busiest districts for calls for service were 3 Sector, 4 Sector, and 6 Sector. The ranking of the sectors with regard to calls for service remained consistent with 2017.

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, 220, 320, 610, 820, and 830. However, it is important to note that 8 Sector 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 first priority is to respond to, 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.

Action – Response Incidents

Each and every time an officer uses physical control techniques to take a subject into custody, contain a situation, 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 2017 and 2018. Three Sector had the highest total with 186 action-response incidents, followed by 7 Sector with 109. The sectors with the lowest totals were 1 Sector with 40, followed by 8 Sector with 59. The department would most likely deploy a greater number of officers to the beats in 3 Sector and 7 Sector 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.

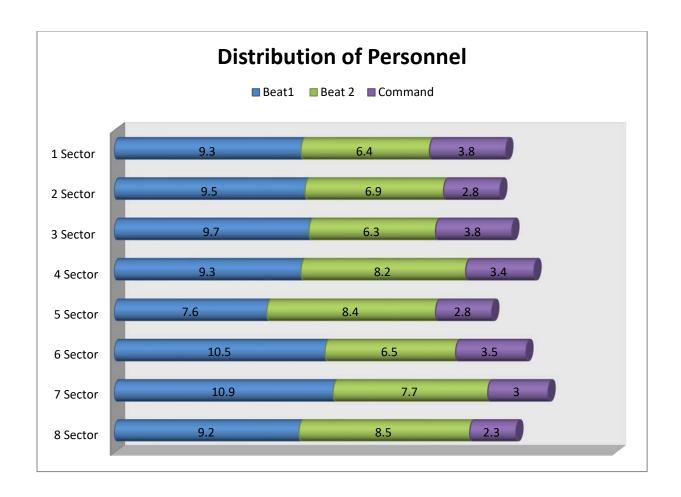


Distribution of Personnel

The following graph shows the distribution of personnel over a 24-hour time period for the Toledo Police Department in 2018. The information was gathered from Communications and is an average from an entire month. 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 present for an entire 24-hour work period; only personnel in field operations were accounted for.

Every Toledo Police Sector is divided into two beats. 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 to that sector. Command officers are not assigned to individual beats, but to sectors.

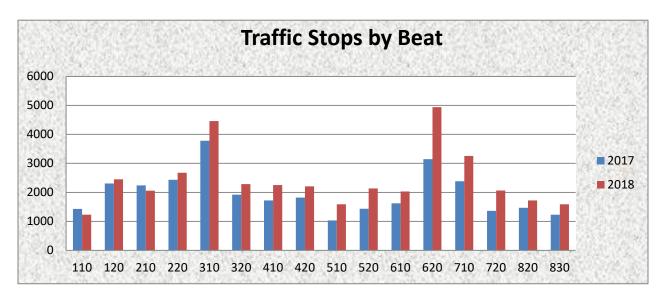
Seven Sector had the highest number of officers assigned with Beat 710 having 10.9 and Beat 720 with 7.7. Four Sector was the next highest with Beat 410 having 9.3 and Beat 420 having 8.2. The lowest average was found in Five Sector with Beat 510 having 7.6 and Beat 520 having 8.4 officers per day.



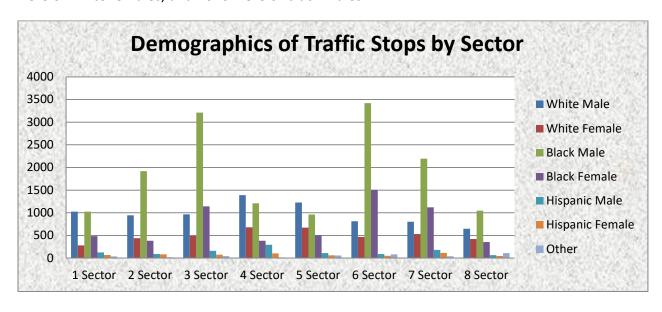
In addition to these officers, the department continues to expand its use of data analyzed by the Criminal Intelligence Section. In doing so, the practice of "intelligence led policing" is used to identify "hot spots" within the city where criminal activity is used to predict future incidents of possible crimes. Departmental resources such as personnel from Field Operations, the Gang Task Force, the Special Intelligence Group, Vice, the Community Services Section, the Traffic Section, and task force partners 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 crime in these high crime areas. Concentrating on high crime areas allows officers to accomplish more with less, which is exactly what the Toledo Police Department had been doing.

Traffic Stops

The below chart displays the number of traffic stops that have occurred in each Toledo Police Beat in 2017 and 2018. The largest number of traffic stops occurred in Beat 620 (4,939) followed by beats 310 (4,457) and 710 (3,255). The fewest number of traffic stops occurred in Beat 110 (1,230) and 510 and 830 both with (1,588). The total number of traffic stops were higher in 2018 compared to 2017 but the data remained consistent. As expected, beats 310, 620, and 710 each had a large percentage of the city's traffic stops. This is likely due to the additional proactive policing activity that occurred in these beats.



The next graph displays the demographics of traffic stops that have taken place in each sector. For example, of the 3,049 traffic stops that occurred in 1 Sector, 1,027 were of white males, 281 were of white females, and 1026 were of black males.



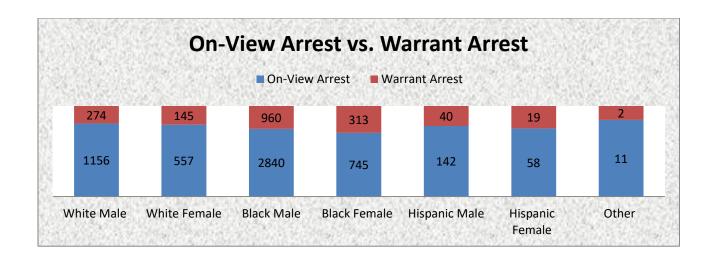
Result of Traffic Stop		sulting in nings	•	esulting in ations	Stops Resultir	ng in Arrest	
	2017	2018	2017	2018	2017	2018	
White Male	60%	61%	23%	19%	17%	20%	
White Female	63%	66%	22%	20%	15%	14%	
Black Male	51%	54%	27%	24%	22%	22%	
Black Female	60%	63%	25%	22%	15%	15%	
Hispanic Male	59%	61%	24%	26%	17%	13%	
Hispanic Female	65%	69%	25%	20%	10%	11%	
Other	74%	80%	22%	16%	4%	4%	

The table above displays the dispositions of traffic stops divided by race and gender. For example, the first row shows of all white males subjected to traffic stops in 2018, 61% received a warning, 19% received a citation, and 20% were arrested.

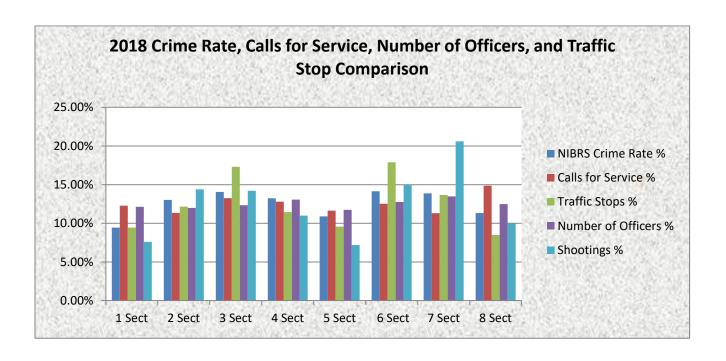
When you compare totals from 2017 to 2018, you can see that the number of warnings given increased for every race and gender. Not only did the warnings increase, but the citations decreased in every category except Hispanic male, which was up by 2%. Police officers have discretion when it comes to issuing tickets to motorist and it appears that discretion is being used. The ultimate goal for police (especially when it comes to traffic enforcement) is that the general public voluntarily complies with the law. If this can be achieved by issuing a warning, but still notifying the motorist about what violation was committed, this will help improve police-community relations and encourage police legitimacy.

The arrest totals that occurred from traffic stops remained consistent with previous years. Black males were arrested at a higher rate than any other group at 22% followed by white males at 20%. It is important to note that "arrest" in this category does not necessarily indicate an individual being placed into custody and transported to the Lucas County Corrections Center. This usually occurs for arrest warrants involving some degree of violence and most on-view arrests. Instead, the majority of individuals arrested on outstanding warrants during a traffic stop receives a Recognizance Summons from officers and are released at the scene, but are counted as "arrests". These percentages are consistent with those found in previous analysis.

It should be noted that an officer's discretion is removed in instances where the driver has a valid arrest warrant, thus removing the opportunity for bias to occur. The table below displays the number of arrests from traffic stops, broken down by those that had a valid arrest warrant versus an arrest stemming from the traffic stop. It should also be noted that officers have to specifically state that the arrest was from a warrant; all others are counted as an on-view arrest, resulting in the appearance that the on-view is higher, while lowering the warrant arrest totals.



Comparison of Numbers



The above 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 9.44% of the NIBRS violent crime rates, 12.28% of the calls for service, 9.45% of the traffic stops, 7.60% of Toledo's shootings, and 12.13% of the officers assigned in the city for 2018.

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 2018, most of the percentages appear to be proportional. The percentage of shootings that occurred in 7 Sector is higher than in the other sectors, which remains consistent with 2017 data. Traffic stops were higher in both 3 and 6 sector than in the other sectors.

Demographic Data

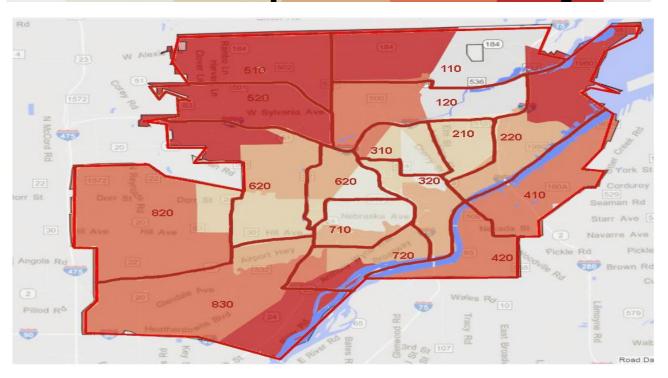
The demographic data shown below, while valuable, is displayed with some concern. The first issue is that the data is not current. The last census was completed in 2010, making this census data nine years old. It is likely the data has changed since these charts were completed. The United States Census Bureau will be a conducting a new census in 2020.

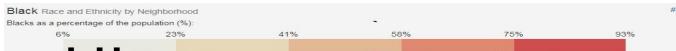
The second concern regarding this data is the effectiveness of using census data as a benchmark or baseline. Census data provides the actual number of residents in an area and not the demographics of the actual drivers in that location. Also, according to a report produced by the National Organization 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.

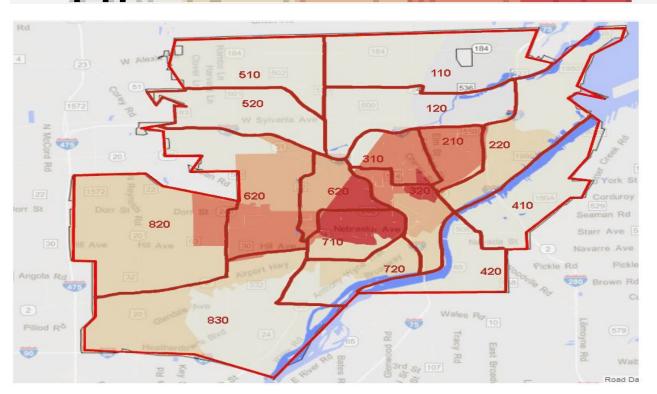
The below demographic maps were located on StatisticalAtlas.com² and represent the percentage of White, African-American, and Hispanic residents within the city of Toledo. On each map, an outline of the Toledo Police Department beat map was overlaid. The darker shades of red indicate a higher percentage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

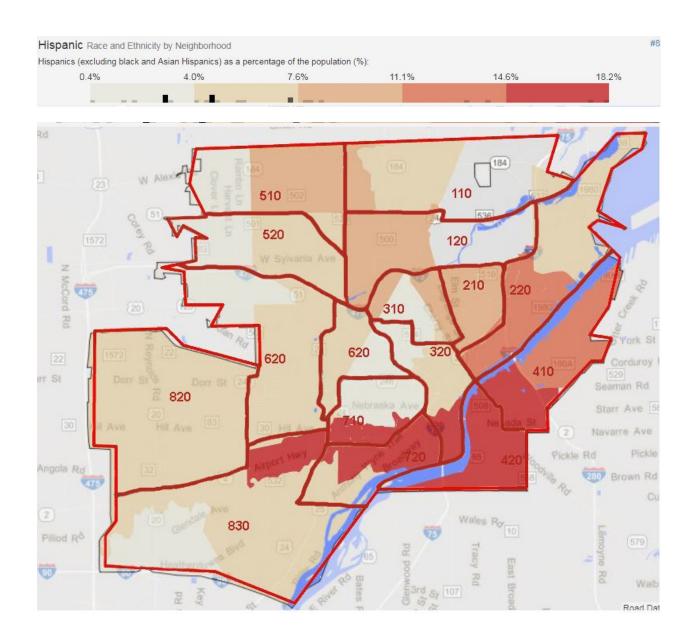
² StatisticalAtlas.com











Field Interviews / Subject Stops

The below tables display data for subject stops and field interviews conducted by Toledo Police officers in 2018. 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 system when an officer puts him/herself out on a subject stop.

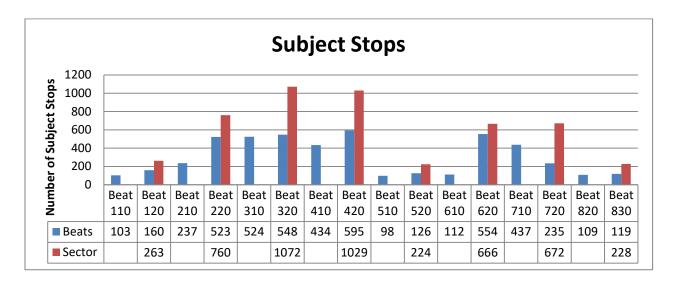
Field interview data is collected from the actual Field Interview reports that officers complete, therefore a subject stop and a field interview could be counted under both totals.

Though not represented in the table, there were 358 less Field Interview reports completed by officers in 2018 than in 2017. The most Field Interview reports were generated in Beat 520 with 69 followed by Beat 320 with 68. The fewest number of reports were generated in Beats 820, 610, and 310. Black males were the group that was recorded the most often on the reports totaling 394 (51%), followed by white males with 269 (35%). Both of these figures are consistent with data that has been analyzed in previous years. 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.

2018 Field Interviews By Race/Gender

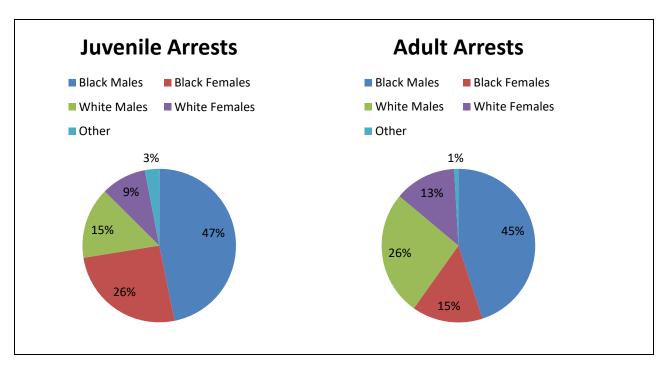
by nace, dender	110	120	210	220	310	320	410	420	510	520	610	620	710	720	820	830	Total
White Male	20	29	15	18	4	22	28	23	27	30	6	6	6	13	6	16	269
White Female	2	0	2	2	1	2	7	5	2	6	1	0	1	3	2	0	36
Black Male	15	26	36	27	27	37	21	24	13	27	25	26	32	26	13	19	394
Black Female	1	1	1	1	2	2	0	2	0	2	1	7	3	2	0	0	25
Hispanic Male	0	1	2	1	0	5	6	1	2	3	0	0	0	4	1	1	27
Hispanic Female	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Other	1	4	1	0	2	0	0	0	1	1	0	0	0	2	0	3	15
Beat Total	39	61	57	49	36	68	62	55	45	69	33	39	43	50	22	39	
Sector Total		100		106		104		117		114		72		93		61	767

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 2018 were down over 10% from 2017. Actually, since 2012 when the crime series started residential burglaries are down over 60% total. It is to be expected that when the Criminal Intelligence Section puts out a series that more field interviews will occur in that area, resulting in less crime and higher arrest.



There were 4,914 occurrences where subjects were stopped by a Toledo police officer in 2018, which is up from 4,539 in 2017. Beat 420 had the most subject stops with 595 followed by Beat 320 with 548; this data in consistent with 2017. The beats with the lowest amount of subject stops were 510 with 98 followed by 110 with 103. One reason for a lower amount of subjects stops could be that these beats had the lowest amount of violent crime incidents they also had the least amount of shooting incidents. Subject stops are not currently broken up by race and gender, but may be something that is looked at in the future.

Arrest Totals



There were a total of 23,301 arrests made in 2018. That number is up from 21,124 in 2017. The above graphs represent the arrests made in 2018 separated by juveniles and adults, and then by race and gender. Hispanic arrests are included in the "Other" category.

Conclusion

The Toledo Police Department is proactively combating bias-based policing issues through the use of department policy, training of officers, thorough investigation of complaints, analysis of traffic stop data, and the annual review of all topics relating to bias-based policing. The Toledo Police Department Manual clearly states; "bias-based policing will not be tolerated by officers." The consequences for officers found to be in violation of this policy are remedial training and/or disciplinary action. All Toledo Police officers receive training on bias-based policing prior to graduation from the Toledo Police Academy, and receive additional training on an annual basis. All allegations of bias-based policing by officers are investigated by the Internal Affairs Section. Finally, analysis of traffic stop/suspect stop data is compared with the demographics, crime rates, calls for service, and any other pertinent data to ensure that any bias-based policing issues are identified and addressed immediately.

Toledo Police officers initiated roughly 38,000 traffic stops in 2018 that number is higher than in 2017. The beats that saw the highest number of traffic stops were Beats 620 and 310. A high percentage of traffic stops that occurred resulted in the officer giving the citizen a warning; this was consistent across all demographics and genders. Black male drivers were stopped at a higher percentage than any other demographic group; a large percentage of those stops occurred in 3 Sector and 6 Sector. When you compare the demographics of the Toledo Police "beats" with the demographics of the traffic stops, the percentages appear consistent. While totals for black male drivers were higher, the outcome of the traffic stops whether it was a warning, citation, or arrest, was consistent with all other races and genders.

The number of field interviews conducted by officers decreased from 1,125 in 2017 to 767 in 2018. Beats 520 and 320 saw the highest percentages of field interviews followed by beats 410 and 120. Black males were the subject on 394 of the Field Interview reports completed followed by white males who were the subject on 269. There were 4,914 subject stops that occurred in 2018, which is up from 4,539 in 2017, with a higher percentage of them occurring in Beats 420 and 320. No patterns of police conduct were detected to indicate the Toledo Police Department or any of its police officers are inappropriately using racial, ethnic, or gender characteristics while conducting traffic stops.

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. 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 has also started the process of redistricting. Redistricting will focus on these disparities and distribute the geographical areas of each beat in a more equitable way. It has been over a decade since this has been completed. Redistricting, along with new census data, will assist in a more accurate analysis in the years that follow.

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 website also provides a wealth of information to the public. On the website you can use the crime map to see what crime is occurring in your neighborhood or to report a crime anonymously. You can also find the department goals and objectives, analysis reports regarding use-of-force, pursuits and bias-free policing, Internal Affairs records and Equal Employment Opportunity (EEO) reports, community surveys, and much more. The flow of information and community outreach should remain a top priority 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.

While there is no evidence of bias-based policing occurring within the department, the need to continuously monitor 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 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 educate officers on topics such as cultural diversity, implicit biases, and human relations and interpersonal communication skills. Training should be continuous and is the responsibility of all instructors, supervisors, managers, and administrators. 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 while backed up by clear policies that have been set in place. Systems of accountability and taking corrective action when needed are vital to remain bias free department.