Circular
Houston Police Department

September 18, 2024 NO. 24-0918-119

SUBJECT: **REMINDER REGARDING CONSISTENT USE OF "STANDBY" MODE ON BODY WORN CAMERAS**

As a follow-up to the recently issued **General Order 400-28**, *Body Worn and In-Vehicle Cameras*, this circular serves as a reminder that employees who are required to wear a body worn camera (BWC) shall ensure that their BWC is both powered on and in Standby Mode (i.e., ready to record) while the employee is conducting routine matters and prior to participating in any law enforcement activities.

This applies to on-duty employees as well as those working extra employment. Additionally, employees shall activate their BWC to record all law enforcement activity regardless of dispatch status. Any officer who intentionally placed their BWC in Off Mode when required by policy to be in Standby Mode shall be subject to discipline, up to and including indefinite suspension.

J. Noe Diaz, Jr.
Chief of Police

jnd:jla:jt

Originating Party:
J. L. Anderson, Assistant Chief
Professional Standards Command

COP #24-86089

TO BE READ AT ALL ROLL CALLS FOR 5 DAYS

General Order

Houston Police Department

ISSUE DATE:	NO.
July 18, 2024	400-28

REFERENCE: Supersedes all prior conflicting Circulars and Directives, and General Order 400-28, dated January 20, 2021

SUBJECT: BODY WORN AND IN-VEHICLE CAMERAS

POLICY

The department uses mobile video recorders (MVRs), including body worn cameras (BWCs) and in-vehicle cameras (IVCs), to enhance police professionalism, improve transparency, improve community relations, resolve allegations of officer misconduct, increase department accountability, and improve officer training and evaluation. The department shall preserve recordings of law enforcement interactions between officers and the general public.

This General Order does not apply to handheld recording equipment, such as digital cameras, or covert recording equipment, such as those placed on undercover officers or criminal informants. Employees shall continue to handle such equipment in accordance with existing policies (e.g., General Order 400-12, **Surveillance Equipment**).

This General Order applies to all employees.

DEFINITIONS

Activate. When an officer places an MVR in Activate Mode from Standby Mode.

Administrative Activity. Any circumstance in which an employee completes tasks with no law enforcement activity (e.g., answering questions from a supervisor, providing coaching or training to another employee) for management, administrative, or organizational purposes.

Classify. For this General Order, the process of categorizing an event for evidentiary or information purposes after the creation of the event, based on the incident details rather than the officer's role or actions.

Deactivate. When an officer places an MVR in Standby Mode from Activate Mode.

Event. For this General Order, a digital recording consisting of video and/or audio footage, captured by an MVR, and created either by activation or the Record-After-the-Fact® capability.

Law Enforcement Activity. Any circumstance during which an officer exercises any level of police authority or conducts any type of criminal investigation, whether consensual or otherwise.

Mobile Video Recorder (MVR). Non-surreptitious, department-issued recording equipment used to record video and audio footage of law enforcement activity, including:

1. ***Body Worn Camera (BWC).*** A recording device worn on the person of a peace officer or attached to the officer's clothing.

2. ***In-Vehicle Camera (IVC).*** A recording device that is mounted in a department vehicle.

Mode. The various settings of an MVR as described below:

1. ***Activate Mode.*** When an MVR is turned on and is actively recording an event.
2. ***Off Mode.*** When an MVR is turned off and is no longer capable of recording.
3. ***Standby Mode.*** When an MVR is turned on but not actively recording an event.

Mute Function. A function in which an MVR will continue to actively record an event without audio.

Record-After-the-Fact® Capability. The ability to create an event from footage contained in the system storage of an MVR that was captured while in Standby Mode.

Video Evidence Management System (VEMS). The hardware and software managed and maintained by the Office of Technology Services (OTS) and used to generate, collect, store, back up, retrieve, review, transmit, and archive events from various MVRs.

1 INTEGRITY OF RECORDED EVENTS AND MOBILE VIDEO RECORDERS

An employee shall only use a BWC or IVC issued by the department unless approved otherwise by the Chief of Police. An employee shall not view or use any event for any purpose other than an official law enforcement purpose. Events are the property of the Houston Police Department. Each employee shall treat all events of law enforcement activity as evidence. An employee shall not erase, alter, copy, or tamper with any event unless otherwise authorized by this General Order, the Chief of Police, or a court of law. To maintain the integrity of evidence and ensure accountability in police operations, employees shall use only the authorized Video Evidence Management System (VEMS) for events collected and maintained by the department.

Unless approved by the Chief of Police, an employee shall not distribute, share, use, or make copies of any event for non-law enforcement purposes, including but not limited to personal gain or entertainment. While viewing an event for official purposes, an employee shall not take a screen shot or make any separate recording (e.g., cell phone photo or video) of the event. Under the Texas Occupations Code, Section 1701.659, it is a Class A misdemeanor for any employee to release a recording created with a BWC without permission from the department.

Unless authorized by the Chief of Police, an employee shall not disassemble or disconnect any part of an MVR or attempt to access the internal storage, files, programs, or configuration of an MVR by any means.

2 USE OF MOBILE VIDEO RECORDERS

Each officer shall wear a BWC in the following temporary or permanent circumstances:

a. An on-duty uniformed officer of the rank of lieutenant or below working the calls for service loop or any other assignment reasonably likely to require law enforcement activity.

b. An on-duty or off-duty uniformed officer (regardless of rank) in a marked patrol vehicle.

c. An on-duty officer of the rank of lieutenant or below while wearing body armor (including an exterior vest) and engaging in law enforcement activity in the field (e.g., Crime Suppression Teams).

d. An on-duty non-uniformed officer, including a task force officer (TFO) assigned to work with a multi-agency task force, when actively participating or holding a perimeter during a planned attempt to serve an arrest warrant, other planned arrest, or serving a search warrant that requires entry into a business, structure, or dwelling, excluding administrative warrants. If federal policy prohibits a TFO from activating a BWC as described in this General Order, the TFO shall not hold the perimeter or participate in the actual arrest or entry during the execution of the warrant.

e. A uniformed officer of the rank of commander or below working police-related extra employment.

f. A uniformed officer (regardless of rank) working police-related extra employment at an alcoholic beverage establishment, as defined by General Order 300-14, **Extra Employment**.

g. Any officer in any unit or assignment so directed by the Chief of Police to wear a BWC.

Each officer required to wear a BWC shall affix their BWC to the front of their uniform (shirt or outer vest) above the horizontal midline of the torso or to the officer's ballistic helmet. The officer shall ensure the BWC is in a position that enables the BWC to capture the best recording possible of the officer's scene and interactions with persons on that scene. The officer shall ensure that obstructions (e.g., winter jacket, traffic vest) do not interfere with proper recording.

When operating a vehicle equipped with an IVC, any officer required to wear a BWC shall use the IVC. The IVC is mounted in the patrol vehicle and may consist of a display, front-facing camera, cabin camera, and secondary camera.

When equipped with both a BWC and IVC, the officer(s) shall sync the devices at the beginning of the shift, as the BWC serves as a wireless microphone for the IVC. The BWC and IVC will remain synced thereafter. The officer shall maintain awareness of the following:

h. Activating a synced BWC or IVC will activate the other if within range.

i. Deactivating a synced BWC will not deactivate the synced IVC.

j. Deactivating the synced IVC will deactivate the synced BWC if within range.

k. Classifying an event with the IVC will classify the event in the synced BWC if within range.

l. Classifying an event with the BWC will not classify the event in the synced IVC. The officer shall also classify the event in the IVC.

Standby Mode

Each officer required to wear a BWC shall confirm that their BWC is in Standby Mode at the beginning of their shift. While performing routine matters and prior to engaging in any law enforcement activity, the officer shall keep their BWC and/or IVC in Standby Mode, ready to

record. An officer who intentionally places their MVR in Off Mode when required by policy to be in Standby Mode shall be subject to discipline, up to and including indefinite suspension.

Special Events

The incident commander of an expected event, as defined by General Order 600-28, **Emergency Management**, shall ensure that each assigned officer required to wear a BWC reports to the expected event with a BWC. If an officer cannot secure a BWC, a lieutenant or higher may authorize the officer (including an officer working extra employment) to work the expected event without a BWC. The authorizing lieutenant shall attempt to secure a BWC for that officer as soon as practicable.

The supervisor tasked with coordinating the response to such events may order officers to record portions of or the entire special event. If not instructed to record the entirety of the special event, the officer shall activate their MVR as required by this General Order.

Unavailable or Non-Functional Equipment

Unless exigent circumstances exist, an officer required to wear a BWC shall not work such an assignment without a BWC. Excluding extra employment, a lieutenant or higher may grant temporary exception to this provision if operationally necessary (e.g., no BWC available for check-out).

If an officer required to wear a BWC or use an IVC discovers a dead battery, malfunction, or loss of equipment, the officer shall immediately notify a supervisor. The supervisor shall determine whether the officer shall replace the equipment or continue working their assignment without fully functional equipment. The supervisor shall base the decision on the nature of the officer's assignment and/or calls holding. The supervisor shall notify the dispatcher of their decision.

Training and Exceptions

Prior to using an MVR, the officer shall be trained in the operation of the equipment. Each shift commander shall ensure that all officers under their command who are required to use an MVR are trained in the proper use of the equipment in accordance with current departmental policy.

Only the Chief of Police may grant a standing exception for wearing, activating, and deactivating an MVR based on operational necessity. A division with a specialized unit seeking an exception shall submit proposed standard operating procedures detailing specific guidelines for wearing, activating, and deactivating an MVR with correspondence to the Chief of Police.

An officer in court, a civil service hearing, arbitration, or deposition shall place their BWC in Off Mode, unless otherwise instructed by the presiding authority (e.g., the judge of the court). The officer shall turn on and activate their BWC for any law enforcement action other than testimony.

3 ACTIVATION OF MOBILE VIDEO RECORDERS

The officer shall activate their MVR to record any and all law enforcement activity, regardless of dispatch status. If it is unsafe, impractical, or unreasonable for an officer to activate their MVR before law enforcement activity, the officer shall activate their MVR as soon as it is safe to do so.

After a late activation, the officer shall audibly note the reason or explanation and verbally notify a supervisor. If necessary, the officer shall also follow the procedures outlined in the below subsection, *Record-After-the-Fact® Capability.*

The officer shall activate their issued MVR as follows:

a. **Priority One or Two Call for Service:** The officer shall activate their MVR as soon as practicable when traveling enroute to the call, regardless of dispatch status.

b. **Any Other Call for Service:** The officer shall activate their MVR upon arrival or commencement of law enforcement activity, whichever is earlier.

c. **Self-Initiated Law Enforcement Activity or On-View Incident:** The officer shall activate their MVR as soon as practicable after identifying any such incident (e.g., vehicle or pedestrian stop, flagged down), prior to turning on emergency equipment or engaging in law enforcement activity.

d. **Search or Arrest Warrant:** The officer shall activate their MVR during all consent searches and prior to the execution of any search or arrest warrant, excluding administrative searches, as defined by General Order 500-19, **Warrant Services Procedures**.

e. **Prisoner or Passenger Transports:** The officer shall activate their MVR to record all prisoner or passenger transports regardless of the gender of the prisoner or passenger, for the entire duration of the transport. While transporting a prisoner in a vehicle without an in-cabin IVC, an officer may detach and place their BWC facing the rear passenger compartment of the vehicle.

f. **Hostile or Contentious Interaction:** The officer shall activate their BWC if a consensual encounter with a member of the general public becomes unexpectedly hostile or contentious.

When at a location where any officer is engaged in law enforcement activity, each officer shall continue recording until authorized by this General Order to deactivate their MVR. Unless otherwise permitted by this General Order, the officer shall not cease recording an incident, situation, or circumstance solely at the demands of the general public.

Unless otherwise permitted by this General Order, an officer shall not remove their BWC from their uniform when in Activate Mode.

Mute Function:

Officers shall use the Mute Function when conferring with a district attorney's office.

An officer may only use the Mute Function of their BWC during conversations with undercover officers or confidential informants, to relay information received from undercover officers or confidential informants, when consulting with a physician at a mental health facility, or when instructed by a supervisor. Prior to activating the Mute Function of their BWC, the officer shall audibly note the reason for muting the audio.

A supervisor may instruct an officer to use the Mute Function when engaging in any administrative activity.

Non-Activation

Unless taking law enforcement action, an officer shall not activate their MVR to record:

a. Personal or non-work-related activity.

b. Any conversation of a fellow employee without their knowledge during routine activities not related to law enforcement activity.

c. The interior of any restroom, dressing room, or locker room.

d. Any department roll call, break room, or administrative activity.

e. Any department meeting (e.g., administrative or committee meeting, mediation, counseling, in-service training).

f. Any briefing, tactical operation, or tactical plan with other law enforcement personnel.

g. Any lineup proceedings or associated briefings, whether conducting or witnessing.

Deactivation

Except as specifically provided in this General Order, an officer shall deactivate their MVR only when all officers have completed all law enforcement activity at the scene or when the officer leaves after completing all law enforcement activity at the scene. When transporting a prisoner, the officer shall only deactivate their BWC when the officer relinquishes custody of the prisoner to jail personnel or when instructed otherwise by jail personnel. The officer shall maintain BWC activation when in a medical or mental health facility for law enforcement activity.

A supervisor may authorize the officer to deactivate their MVR in the following circumstances:

a. During a strategic or tactical briefing or when conferring with an undercover officer about an operation.

b. On an extended scene that is fully contained, under control, and does not have ongoing activity with suspects, if the officer's assignment does not include the collection of evidence or interaction with witnesses.

c. Within an inner perimeter that is cordoned off with crime scene tape.

d. When conducting administrative activity as the officer's sole function on the scene, if the scene is fully contained and under control, has no ongoing activity with suspects, and does not require any law enforcement activity by the officer.

e. On a hospital assignment pursuant to General Order 500-03, **Guarding Prisoners at Area Hospitals**, when not reasonably likely to significantly interact with a suspect.

f. When the officer responds to a scene, not involving family violence, where a person may have been traumatized (e.g., sexual assault), when actively recording the person's statement reasonably appears to inhibit the statement.

g. When necessary to review an event contained on any MVR while still on the scene. If the incident is being or expected to be investigated by Internal Affairs Division (IAD) and/or Special Investigations Unit (SIU), only a supervisor from that unit may authorize this deactivation, pursuant to divisional standard operating procedures.

The supervisor shall ensure that each officer deactivates their MVR on any officer's "walk-through" following a critical incident.

An officer deactivating their MVR with authorization of a supervisor shall audibly note the authorizing supervisor's name prior to deactivation. The officer shall leave their MVR in Standby Mode and shall resume in Activate Mode before the officer engages in any other law enforcement activity.

Privacy Concerns

An officer may briefly deactivate their BWC when entering and using the restroom but shall immediately activate their BWC again after exiting the restroom.

If an officer inadvertently creates a sensitive event (e.g., while using the restroom, dressing and/or undressing in a locker room) when not required by policy to have their BWC in Activate Mode, the officer should notify a supervisor, who shall notify the shift commander. The shift commander shall then notify the OTS Video Production Services to retain the event with restricted access.

Record-After-the-Fact® Capability

The Record-After-the-Fact® capability provides an officer with the opportunity to correct a failure to activate, late activation, or early deactivation when the officer had their BWC in Standby Mode. If the officer follows the provisions of this subsection, the officer shall not be subject to discipline for failure to activate, late activation, or early deactivation. If an officer does not use the Record-After-the-Fact® capability to create an event when the officer was required to activate their BWC, the officer remains subject to discipline for such action or inaction.

If any employee, including a supervisor, creates an event or causes an event to be created using the Record-After-the-Fact® capability without proper authorization, the employee shall be subject to discipline, starting at Category D and up to and including demotion or indefinite suspension.

If an officer develops a pattern of failure to activate, late activation, or early deactivation, the officer's supervisor shall address the pattern through counseling, followed by progressive discipline if necessary.

Officer-Initiated Event Creation:

An officer shall only use the Record-After-the-Fact® capability to create an event related to law enforcement activity where the officer was required by policy to activate their BWC. To create the event, the officer shall verbally notify a supervisor (e.g., over the radio, in person, by telephone), then send the supervisor an email containing the BWC serial number, incident number, and the start and end times for the requested event (in most cases, the enroute or arrival times and clearance times for the call), taking into account any period already recorded.

A supervisor shall not create an event without an email from the officer requesting creation of the event. Upon receipt of the email, the supervisor shall confirm the officer's enroute, arrival, and clearance time via CAD if possible. The supervisor shall ensure that the officer docks their BWC. The supervisor shall then create the event of the specific time request after verifying the data transfer dock number and BWC serial number. The supervisor shall reply to the officer's email to confirm creation of the event. The officer shall then properly classify the event.

If the supervisor cannot create the event prior to the end of the officer's shift, overtime program, or extra employment, the supervisor shall take custody of the BWC and place the BWC in Off Mode. A supervisor shall maintain control of the BWC until a supervisor can create the event. If the supervisor is unable to create the event within eight hours, the supervisor shall notify the shift commander, who shall ensure that the event is created as soon as practicable. In the event of a technical problem or malfunction, the shift commander shall contact OTS.

Critical Incident or Criminal Allegation Event Creation:

When investigating a critical incident or a criminal allegation with a formalized complaint, a supervisor from the Special Investigations Unit (SIU) may create an event (if necessary) from any officer's MVR (including both a BWC and IVC) with the authorization of an assistant chief or higher. When investigating a critical incident involving a City vehicle crash that includes serious bodily injury or death, a supervisor from the Vehicular Crimes Division's (VCD) Crash Reconstruction Unit may follow the same procedure to create an event if necessary. Following creation of the event, the SIU or VCD supervisor shall notify the officer via email.

Event Created in Error:

If an authorized supervisor inadvertently creates an incorrect event through human error, the supervisor shall not review the event. The supervisor shall immediately notify their immediate supervisor, who shall notify the OTS Video Production Services to restrict access to the event.

4 EXTRA EMPLOYMENT

An officer wearing a BWC at extra employment shall activate their BWC as outlined in Section 3, *Activation of Mobile Video Recorders*. Any officer without a permanently assigned BWC shall check one out at a patrol station or at 1200 Travis and return it pursuant to Section 5, *Responsibilities*.

If the officer's BWC becomes inoperable, the officer shall notify an on-duty patrol supervisor responsible for the district where the officer is working. If outside the City limits, the officer shall notify an on-duty supervisor assigned to the Command Center Division. The on-duty supervisor shall ensure delivery of a replacement battery or BWC, if possible; if unable to do so, the supervisor shall determine whether the officer may continue to work the extra employment without the BWC or must cease working. An officer permitted to continue working extra employment shall make a note in the extra employment check-in database and document the event in any incident report created during the extra employment, including the name of the authorizing supervisor. The notified supervisor shall not allow any officer to work an alcoholic beverage establishment without an operable BWC for any amount of time.

The officer shall upload any event captured during or while traveling to or from police-related extra employment as soon as practicable, but not later than 72 hours after the incident. If the officer captured any Class B or higher arrest or other significant event, the officer shall upload the event before the conclusion of the extra employment.

5 RESPONSIBILITIES

Each supervisor shall review any relevant events prior to submitting any administrative reports as they relate to incidents involving use of reportable force, pursuant to General Order 600-20, **Use of Force Reporting**, and vehicle pursuits, pursuant to General Order 600-04, **Motor Vehicle Pursuits**.

When reviewing an event for any reason, each supervisor should handle discovered issues in the least intrusive manner possible to correct the observed conduct.

Officer Responsibilities

Each officer issued an MVR, whether temporarily or permanently, shall:

a. Be responsible for the care and custody of each assigned MVR.

b. Ensure the BWC is assigned to them, that they are logged into the IVC, and that their BWC and IVC are synced.

c. Inspect their assigned MVR each workday to ensure that there is no visible damage and that the device is in proper working order with sufficient charge and system storage to use during their shift, overtime, or extra employment.

d. Immediately report a lost, damaged, or stolen MVR to a supervisor.

e. Properly classify each event, whether primary or secondary on the call, on the MVR or within VEMS, according to the following criteria.

   1. **Class B+ (10 Year Retention):** Investigations of criminal offenses (whether charges are filed or not) that are Class B misdemeanors and above, calls involving a person's death or emergency detention for mental health, and incidents involving reportable force.

   2. **Class C (3 Year Retention):** Investigations of Class C offenses and traffic stops.

   3. **Information (1 Year Retention):** All other BWC recordings.

f. Ensure that the officer is listed on the call slip of any scene where the officer activated their BWC.

g. At the end of their shift, ensure that the IVC uploads wirelessly, log out of the IVC, and place the BWC into the data transfer dock for upload.

h. Return any BWC checked out for extra employment or an overtime assignment at the end of such assignment to the division where the officer checked out the BWC. With authorization

from the division commander at the patrol station (or the Command Center Division if checked out from 1200 Travis), the officer may delay return of the BWC for up to 72 hours.

Office of Technology Services Responsibilities

The Office of Technology Services (OTS) shall:

a. Deploy, maintain, and support the functionality of all MVRs, peripheral devices and cables, video transfer devices, workstation software, system settings, and any other equipment located on-site.

b. Issue replacement MVR and update the database to reflect changes in equipment status and assignment.

c. Maintain a master inventory of MVR and conduct an annual inventory.

d. Support employees accessing VEMS and address other technological issues.

e. Support employees performing audit protocols.

f. Handle special requests to access videos not normally accessible by employees.

g. Have sole responsibility to liaise with the equipment manufacturer for parts and replacement.

h. Coordinate with Houston Information Technology Services (HITS) Department to maintain network connectivity, server availability, backup copies, and storage availability.

6 DOCUMENTATION IN INCIDENT REPORTS

An officer shall not substitute creating an event for completing a thorough original or supplement incident report.

When an officer completes an original or supplement incident report, the officer shall document the use of an MVR in the incident report by selecting the appropriate option in the Records Management System (RMS) drop down menu. The officer shall also document the use of an MVR in other reports and/or any corresponding documentation.

The primary officer shall include references in the narrative of the incident report to all employees (by name and employee number) who used an MVR while on the primary unit's scene or on any scene associated with the incident.

Each officer shall continue data collection required by General Order 600-42, **Racial Profiling Prohibited**, regardless of whether the officer uses an MVR. Each officer involved in any use of force incident captured by an MVR shall follow the applicable departmental policies regarding the reporting of force in General Order 600-20, **Use of Force Reporting**.

If an officer is unable to upload the event due to illness or injury, the officer shall inform an appropriate supervisor, who shall ensure the event is uploaded as soon as practicable.

In critical incidents (e.g., officer-involved shooting, in-custody death, officer-involved incident that resulted in any person's serious bodily injury or death), a supervisor shall take custody of all involved BWCs at the scene and ensure they are transferred to IAD or SIU. If IAD and SIU do not make the scene, the supervisor shall ensure that all relevant events are uploaded. The supervisor shall not task an officer involved in the critical incident with uploading the event(s).

7 REVIEWING RECORDED EVENTS

An officer may review any of their events as needed for official duties (e.g., completing an incident report). The officer should review their own event prior to completing use of force documentation and prior to providing testimony at any hearing, trial, or deposition.

Any employee discovering an event with poor video quality, audio quality, color rendition, and/or focus shall notify their division technology coordinator (DTC) with the MVR serial number. Upon such notification, the DTC shall contact OTS for further direction.

Any supervisor who believes an event has training value should send correspondence through the chain of command (division commander level) to the Training Division commander.

If an investigator determines an event is available for an assigned case, the investigator shall associate the event with the incident number in VEMS, which places the retention schedule in suspension.

Internal Affairs Division or Special Investigations Unit

An IAD or SIU investigator may view any event and may classify the event as "Confidential" if deemed necessary.

In accordance with civil service law, an IAD investigator (including division level IAD investigators) shall not show a complainant or witness video from an event until a complaint has been formalized.

Each officer is entitled to access any event of an incident involving the officer before the officer is required to make a statement about the incident.

Requests for Recordings

An officer seeking a copy of an event for reasons other than official departmental purposes shall make a request in writing through the chain of command to the officer's assistant chief stating the specific reason(s) for requesting the event.

Events captured during the scope of an officer's duties may be subject to release to the public under applicable laws. Any employee who receives a request to view or obtain a copy of any event shall refer the request to the Open Records Unit of the Office of Legal Services, which shall handle the request in accordance with Chapter 552 of the Texas Government Code (Public Information Act), Chapter 1701 of the Texas Occupations Code, and departmental procedures.

For additional information, the officer may direct the inquiring person to the City of Houston website at http://www.houstontx.gov/police/public_information.htm.

Requests from Other Law Enforcement Agencies and Criminal Prosecutors:

An employee who receives a request from another law enforcement agency to view or copy an event shall refer the requesting agency to the Office of the Chief of Police. However, the department does not require the United States Attorney's Office, the District Attorneys of Harris County, Montgomery County, and Fort Bend County, and the City of Houston Municipal Prosecutors to make a request in writing to the Chief of Police for copies of or access to events. An employee who receives such a request shall instead refer the request to OTS.

8 AUDITS OF RECORDED EVENTS

In addition to regular event reviews pursuant to department policy, each supervisor who supervises a classified employee the rank of officer, sergeant, or lieutenant shall audit at least one BWC event per classified direct subordinate per month (if any events exist), as instructed by the department, to monitor compliance with departmental policies and procedures. A civilian supervisor of any such classified employee shall request that the division commander assign a classified supervisor in the same division to complete the monthly audit.

BWC Audits by Risk Management Division and the Independent Police Oversight Board

The Independent Police Oversight Board (IPOB) and the Risk Management Division (RMD) shall conduct the below BWC audits two times per year. For each audit, RMD shall submit a report documenting their findings to the Office of Planning and Data Governance (OPDG).

b. **Semiannual Activation Audit:** RMD shall audit a random sample of events selected from a division that uses BWCs to confirm that the officers activated their BWCs in accordance with department policy. RMD need not view any of these events.

c. **Semiannual IPOB Audit:** RMD shall instruct OTS to randomly select twenty BWC events and deliver the events to the IPOB. After the IPOB members deliver written opinions whether any departmental policies and procedures may have been violated, RMD shall view the same twenty events for the same purpose.

Semiannual Audits by the Office of Technology Services

OTS shall perform audits twice per year of randomly selected events (BWC and IVC) for quality control purposes to ensure video quality, audio quality, color rendition, and proper focus. OTS shall also conduct system audits focusing on user access, retention schedules, partial or incomplete video files, and system storage. OTS shall submit a report documenting their findings to OPDG.

OTS shall deliver a semiannual report to OPDG containing the number of events created through activation and the number of events created using the Record-After-the-Fact® capability.

Larry J. Satterwhite
Acting Chief of Police