

# **CLEVELAND DIVISION OF POLICE**



### **GENERAL POLICE ORDER**

EFFECTIVE DATE:	CHAPTER:	PAGE:	NUMBER:
JANUARY 1, 2020	4 - Field Operations	1 of 15	4.06.04
SUBJECT:	WEARABLE CAMERA SYSTEM	1	
CHIEF:	Calvin D. Williams, Chief		

**PURPOSE:** 

To establish guidelines for use, management, storage, retrieval, and supervision regarding the Wearable Camera System (WCS), and to provide officers with clear guidance on the use of the WCS and preservation of recordings to foster transparency, increase accountability, build trust, and protect the privacy rights of individuals.

**POLICY:** 

The WCS shall be deployed to ensure transparency and foster trust within our community. It shall be the responsibility of each officer to deploy their WCS in accordance with this order.

#### **DEFINITIONS:**

**Buffering Mode** - after the WCS is powered on, it continuously loops thirty seconds of video only.

**Event Mode** - activated when the WCS is in buffering mode and the event button is pressed two times within one second. The indicator light will begin blinking red giving users a visible indicator that the WCS is now actively recording video and audio. Thirty seconds of pre-event video without audio will be captured from buffering mode. An audible tone will also alert officers that the WCS is activated.

**Evidence.com** - an online, web-based digital storage medium facility. This virtual warehouse stores the digitally encrypted data in a highly secure environment accessible to personnel based on their security clearance.

**Evidence Sync** - the desktop or Mobile Data Computer (MDC) application that allows WCS users to view captured media from their WCS via a standard USB cable. Officers may also tag, categorize, add notes, and/or incident report numbers to captured media and will allow for upload to their evidence.com account.

**Evidence Transfer Manager (ETM)** - the docking unit used to recharge the WCS and upload the encrypted captured media. The ETM then transfers the encrypted data digitally to evidence.com.

**Plain Clothes** - clothing and accessories common to civilian attire. An officer whose predominant attire is civilian, regardless of insignia suggesting otherwise, is considered to be in plain clothes.

**Undercover -** officers attired in civilian clothing, lacking police insignia and equipment and performing duties in which recognition of such person as a law enforcement officer would jeopardize their personal safety and/or current or future investigations.

**Undercover Vehicles** - those vehicles not equipped with police radio, lights and/or sirens, specifically used in undercover operations. Undercover vehicles <u>do not</u> include unmarked vehicles issued to investigative units and assigned by the city.

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**Unmarked Vehicles** - those vehicles equipped with police radio, lights and/or sirens, specifically used by officers in plain clothes. Unmarked vehicles are vehicles issued to investigative units, assigned by the city, and are not used for undercover operations.

**Wearable Camera System** - a body worn digital recording device with secured internal memory for storage of recorded video and audio, which operates in two modes, buffering and event. The Cleveland Division of Police currently uses Taser Axon wearable cameras.

#### **PROCEDURES:**

#### I. General Guidelines

- A. All officers assigned a WCS, while in the field, shall activate their camera prior to responding to all calls for service, prior to all investigative or enforcement contacts with the public, or other contact with the public that may or does become adversarial after the initial contact. Officers shall understand there are exceptions and prohibited times to record set forth in Section II.C. and II.D. below.
- B. If an on-duty or off-duty officer is the subject of an incident, the responding officer's WCS shall not be returned to buffering mode until the incident has been fully investigated by a superior officer on scene or if permission is granted by a commander or a Force Investigation Team (FIT) Officer-in-Charge (OIC).
- C. If placing the WCS in event mode is not feasible due to an immediate risk to the safety of the officer or others, the officer shall place the WCS in event mode as soon as the immediate threat has been addressed.
- D. Officers shall <u>not</u> edit, delete, or alter captured media. The security features of evidence.com ensure compliance and track all access to captured media.
- E. The existence of captured media shall <u>not</u> replace a thorough, accurate, and complete incident report, Form-1, or investigation.
- F. Officers shall be responsible for all WCS equipment assigned to them. If an officer's issued WCS is damaged, lost, stolen, or malfunctioning, the officer shall immediately notify a supervisor and as necessary complete a Form-1 and/or an incident report, and contact the Mobile Support Unit to receive a replacement camera.
- G. Officers shall surrender their WCS to the OIC, or designee, of the FIT, Accident Investigation Unit (AIU), Internal Affairs Unit, or any supervisor upon request.
- H. The Division reserves the right to limit or restrict an officer's ability to view captured media based on the circumstances surrounding the incident.
  - 1. Officers are authorized to access their own WCS recording for a legitimate law enforcement purpose, including but not limited to completion of reports.

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- a. If a FIT response is not required, officers may view their own or another officer's WCS recording, *only* as necessary to complete required reports or to complete a supervisory investigative/administrative function.
- b. If a FIT response is required, officers may only view their WCS recording when authorized by the FIT OIC.
- I. Officers shall detail in a Form-1 successful court challenges to the use or appropriateness of captured media and shall forward it to the Chief's Office and the Mobile Support Unit. The Form-1 shall include a summary of the ruling as well as a description of any restriction or sanction resulting from the ruling.
- J. Officers shall be subject to the disciplinary process for intentional, repeated or otherwise unjustified failure to activate their WCS in violation of the Division policy.
- K. Officers shall use only Division issued recording devices (WCS, video/audio recorders) while on-duty. THE USE OF PERSONAL RECORDING DEVICES (VIDEO AND/OR AUDIO) WHILE ON-DUTY IS STRICTLY PROHIBITED.

### II. Camera Deployment

- A. Beginning of tour of duty officers shall:
  - 1. Inspect the WCS and related equipment to ensure there are no visible or obvious signs of damage.
  - 2. Place the WCS, with the camera in the upright position, in a location, on the upper chest, that will most closely capture the officer's field of view.
    - a. The WCS shall not be placed on the belt or lower chest area.
    - b. If the WCS is secured to an outer garment that is removed, the WCS shall be removed from the outer garment and placed as required above.
  - 3. Turn on the WCS, press the activation button twice, and listen for the audible signal to verify the unit is receiving power and functioning properly (Refer to Section I.F.).
  - 4. Leave the camera in buffering mode, for the duration of their tour of duty, so the WCS can be easily placed into event mode when required.
  - 5. Conduct a 360-degree walk around inspection of their assigned police vehicle, in appropriate lighting conditions, recording and verbally noting any fresh damage discovered and report it to their immediate supervisor. The 360-degree walk around inspection shall include an inspection of the interior, back seat, and trunk.
    - a. Only the driver of the vehicle shall conduct this inspection.
    - b. Undercover vehicles are exempt from this recorded inspection.

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- B. During tour of duty requirements for recording officers shall:
  - 1. Prior to responding to all calls for service and prior to all investigative or enforcement contacts with the public, place their WCS into event mode, including but not limited to:
    - a. Calls for service.
    - b. Traffic stops.
    - c. Arrests.
    - d. Searches.
    - e. Interviews.
    - f. Pursuits.
    - g. Prisoner/citizen transports.
    - h. Any situation an officer believes captured media may be of use.
  - 2. Place their WCS into event mode during other contacts with the public that may or does become adversarial.
  - 3. Unless impractical due to officer safety issues, advise citizens that a camera is on and recording audio and video.
  - 4. Keep the WCS in event mode until the contact has concluded or when ordered by a Cleveland Division of Police supervisor.
  - 5. Document the existence of captured WCS media, using the acronym "WCS", when completing incident reports, when documenting dispositions in duty reports and the Mobile Computer Aided Dispatch (MCAD), and when completing documents such as UTTs, MMs and PINs. Include the incident number on any citation.
  - 6. Record an inspection of the backseat of a zone car after any incident when a person is detained or transported.
  - 7. Document the reason that a WCS unit has been returned to buffering mode. Documentation shall take the form of making a recorded announcement on the WCS. Examples include:
    - a. Contact complete.
    - b. Incident complete.
    - c. Ordered by supervisor (name) to end recording.

- i. Exceptions to recording (Section II.C.1.a-i).
- ii. Prohibited recording (Section II.D.1.a-f).
- 8. Notify a supervisor when a WCS was not placed into event mode in compliance with this order as soon as practical.

# C. Event mode: exceptions to recording

- 1. The WCS may be returned to buffering mode for the following circumstances after obtaining approval from their immediate supervisor or the sector/unit supervisor, or the supervisor in charge of the scene (e.g., FIT):
  - a. When entering a private home or building where consent of the owner or person with authority to consent to the entrance is required and that person expressly declines to permit video and/or audio recording inside the home or building. This *exception* will not apply to an entrance where consent is not required or no longer required once inside the home/building, including entrances related to a search warrant, arrest warrant, domestic violence calls, and emergency or exigent circumstances. If possible, officers shall request that the citizen step outside or, depending on the circumstances and with supervisory approval, return the WCS to buffering mode.
  - b. When interacting with a victim or witness who refuses to cooperate if the WCS is in event mode. If practicable and reasonable, record the victim or witness requesting the WCS be turned off.
  - c. When interacting with a juvenile victim or witness, a parent or legal guardian may refuse to allow the juvenile to cooperate while the WCS is in event mode. If practical and reasonable, record the parent or guardian requesting the WCS be turned off.
  - d. When requested by a victim of domestic violence or sexual assault. If practicable and reasonable, record the victim's request that the WCS be turned off.
  - e. When the incident or event is of such duration that deactivating the WCS is necessary to conserve available recording time and there would be no loss of critical documentary information.
  - f. When investigative personnel arrive on scene and begin the formal investigative process.
  - g. When an officer is involved in a traumatic incident and needs one on one contact with family, officers, friends, and/or co-workers to manage any emotional stress created by the incident, the officer shall be removed to the outer perimeter.

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- h. Protected health information and treatment when requested by the patient, medical facility staff, Emergency Medical Service personnel, or Division of Fire personnel.
- i. Images of confidential informants or undercover officers, unless requested by the undercover officer, their supervisor, or commanding officer.
- 2. Officers shall record, while the WCS is in event mode, the reason the WCS is being returned to buffering mode (Refer to Section II.B.7.).

#### D. Event mode: prohibited recording

- 1. Officers shall not record in event mode in the following circumstances/situations:
  - a. Internal non-investigative staff meetings, hearings, and non-enforcement related encounters with other officers, supervisors, command staff, or city employed civilians assisting the Division.
  - b. Conversations of fellow officers or civilian employees without their knowledge during routine, non-enforcement related activities.
  - c. Any place where there is a reasonable expectation of personal privacy (e.g., dressing rooms, restrooms) unless necessary to fulfill a law enforcement objective.
  - d. Conversations of/with citizens and/or officers unrelated to investigative or enforcement contacts (e.g., administrative duties, court, community meetings).
  - e. Undercover vehicles
  - f. Plain clothes/undercover investigative procedures and techniques including, but not limited to surveillance operations, cultivating confidential informants, and buy busts.

### E. End of tour of duty officers shall:

- 1. Conduct a 360-degree walk around inspection of their assigned police vehicle recording and verbally noting any fresh damage, not discovered during the tour and report it to their immediate supervisor. The 360-degree walk around inspection shall include an inspection of the interior, back seat, and trunk.
  - a. Only the driver of the vehicle shall conduct this inspection.
  - b. Undercover vehicles are exempt from this recorded inspection.
- 2. Inspect the WCS and related equipment to ensure there are no visible or obvious signs of damage. If signs of damage are discovered, report the damage to the officer's immediate supervisor.

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- 3. Categorize captured video, throughout their tour, by using a MDC or city computer, using the Evidence Sync/Axon View application. Officers may use a cellular device to categorize captured media.
- 4. If using Axon View on a cellular device officers shall not:
  - a. Use the video for anything other than official use.
  - b. Transfer the video anywhere other than evidence.com.
- 5. Prior to uploading, place a title, enter an ID (incident number), and categorize the captured media.
  - a. Use Evidence Sync/Axon View and properly tag all captured media.
  - b. Title the captured media similar to a duty report or MCAD entry, including the address, nature, and disposition.
  - c. Add incident numbers when appropriate, double checking the accuracy of incident numbers, to corresponding captured media as four digit year, dash, and six digit incident number (20XX-XXXXXX).
  - d. Place all captured media into the appropriate category. If multiple categories apply, place the captured media into the category with the longest retention period.
- 6. Place the WCS into the ETM slot for uploading of captured media and charging.
- 7. Notify their immediate supervisor if they are unable to upload or if the uploading, categorizing, or tagging procedure will cause them to accrue overtime. Officers shall not, while on-duty, wait for a WCS to upload in order to use the WCS at secondary employment.

# III. Supervisor Responsibilities

### A. Supervisors shall:

- 1. View captured media using evidence.com.
- 2. Ensure officers assigned a WCS are using the device in compliance with this order and complete an investigation for violations of this order as appropriate.
- 3. Document in their daily duty report any incident in which an officer notifies them about an incident in which the WCS should have been activated but was not.
- 4. Instruct officers to return their WCS to buffering mode only when the exceptions to recording (Section II.C.) or prohibited recording (Section II.D.) apply.

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- 5. Record on their WCS which exception to recording or prohibited recording they used to instruct the officer to return their WCS to "buffering mode" or "OFF".
- 6. Reference the existence of captured media in a distinct and separate heading in a supervisory investigation including:
  - a. All captured media reviewed.
  - b. Any discrepancies between the captured media and reports.
- 7. Complete a supervisory investigation (including involved officers' Form-1s and incident reports) into the damaged, lost, or stolen WCS and forward it through the chain of command via the tracking software.
- 8. When notified that an officer is unable to complete the tagging of captured media, determine if immediate attention is required or if the task can be completed at the start of the officer's next tour of duty. Supervisors shall note on their daily duty report any permission and justification for overtime or delay in tagging recorded events.
- 9. Contact the Mobile Support Unit OIC to arrange for pick up or to drop off any damaged or malfunctioning WCS.
- 10. During WCS reviews, move captured media into correct categories if needed, adding notes indicating the reason for moving the captured media.
- IV. Supervisor Reviews of Blue Team Entries with Video Attached
  - A. Tracking software entries with video attached include, but are not limited to:
    - 1. Use of force.
    - 2. Injury to officer.
    - 3. Vehicle pursuits.
    - 4. Motor vehicle collisions.
    - 5. Commendations.
    - 6. District Bureau Investigations (DBI).
    - 7. Divisional charges.
  - B. The initial investigating supervisor in the routing shall:
    - 1. Ensure WCS recordings from officers who were present during the incident are attached to the incident being reviewed or investigated.

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- 2. Ensure all video is categorized as a critical incident if there is potential for corrective action (e.g., observing damage to zone car during beginning/ending vehicle inspection).
- 3. Review all available electronic media sources so that they may be able to render a reasonably conclusive decision on whether policy and procedures were followed during the incident. The focus of the review will be on relevant portions of the electronic media recording, looking for proper use of force, safe tactics, and appropriate citizen interaction.
- 4. Place markers at the beginning and end of relevant portions of the recordings. Each marker shall be edited to include an explanation of that marker (e.g., beginning of use of force, end of use of force, or any description of violations observed). Markers shall include, but not be limited to the following areas:
  - a. All portions of video that require attention.
  - b. Use of force. Place the beginning marker prior to where the initial contact is made with the involved citizen and the ending marker after the conclusion of the use of force.
  - c. Injuries. Place the beginning marker before the injury and the end marker after any actions causing the injury.
  - d. Vehicle pursuits. Place the markers before the beginning and at the end of the pursuit (e.g., pursued vehicle is stopped or stops, or the pursuit is terminated).
- C. Each additional supervisor in the chain of command who reviews the entry shall:
  - 1. Review the portion of captured media that is recorded between the markers of the incident being reviewed or investigated.
  - 2. Review any pertinent parts of the video preceding and following the sections indicated with the markers to ensure markers were properly placed.
  - 3. Document in the notes section of the evidence.com video page, the date and the parts of the video that were viewed (e.g., Lieutenant Smith, 05/28/XX, viewed from start of video through 5:15).

# V. Supervisor Reviews of Captured Media

- A. Supervisors shall conduct adequate and direct reviews of WCS recordings created by officers under their command to confirm compliance with Cleveland Division of Police policy and to identify areas where additional training or guidance is needed.
- B. The OIC shall:

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- 1. During their tour of duty, check all WCS videos (uploaded to evidence.com) of officers assigned to their respective platoon or unit for the current workday as follows:
  - a. Check for categorization and ensure the incident number is properly documented using a four-digit year and six-digit CAD number (e.g., 20XX-XXXXXX).
  - b. The following is the procedure for checking WCS video for your shift:
    - i. Log into evidence.com.
    - ii. Click on the word 'Evidence' in the top left corner of the screen.
    - iii. Under 'User Name or Group', type the officer's name in the box.
    - iv. For <u>Uncategorized video only</u>, select 'Uncategorized' from the 'Category' box.
  - c. Ensure officers who have not entered incident numbers properly or who have not categorized WCS video correctly, immediately do so in evidence com
  - d. Document in their daily duty report all corrections made and/or reasons corrections were not able to be made (e.g., officer on v-days, furlough).

#### C. Lieutenants shall:

- 1. Ensure the OIC completes the daily review of categorized and uncategorized captured media described in section V.B.
- 2. Review each officer (sergeants and patrol officers) under their command once per year. Twenty-five percent of reviews shall be completed per quarter.
  - a. Review two videos from each of four separate categories, excluding category 4-Administrative and Alarms, per sergeant/officer under review, if available.
  - b. Complete at minimum, a five-minute review of each video being reviewed. When officers/sergeants have no video of more than five minutes, a review shall be conducted of the entire chosen video. The review shall be of video showing sergeant/officer interactions with individuals.
- 3. Complete the Quarterly Lieutenant Level WCS Review Report.

### D. Captains shall:

1. Review each lieutenant under their command once per quarter.

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- a. Review two videos from each of four separate categories, excluding category 4-Administrative and Alarms, per lieutenant under review, if available.
- b. Complete at minimum, a five-minute review for each video being reviewed. When lieutenants have no video of more than five minutes, a review shall be conducted of the entire chosen video. The review shall be of video showing lieutenant interactions with individuals.
- 2. Review and forward the Quarterly Captain and Lieutenant Level WCS Review Report.
- 3. Conduct weekly checks of their sections uncategorized videos to ensure compliance, following steps set forth in section V.B.1.b.
- E. Quarterly Lieutenant/Captain Level WCS Review Report
  - 1. Completion dates.
    - a. Quarterly Captain and Lieutenant WCS Reviews are required to be completed for the quarters ending on the following dates: March 31, June 30, September 30, and December 31.
    - b. All WCS Review Reports shall be filed with the Inspection Unit within ten working days from the end of the quarter.

### VI. Completion of the WCS Review Report

- A. One form shall be completed per quarter per unit/platoon.
- B. Proper completion of the form.
  - 1. First Initial, Last Name, Badge Number Name of Officer Under Review.
  - 2. Incident Number and Date of Recording e.g., 20XX-001234 and 01-02-20XX.
  - 3. Duration of video reviewed e.g., viewed from 14:00 14:08 mark.
  - 4. Compliant or non-compliant.
    - a. When viewing for compliance, ensure WCS usage falls within guidelines. Review for proper field of view, properly activating and deactivating WCS.
  - 5. Corrective action taken.
    - a. If it is determined that an officer was non-compliant, list corrective actions taken; for example, 'video title corrected', 'incident number corrected'. If

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the error/offense observed requires a recommendation for discipline, the entry should state, 'see DBI entry for details'.

- 6. Inspecting Supervisor Badge Number.
- 7. Date of Inspection Date the video was viewed e.g., 01-02-20XX.

# C. Forwarding the Report

- 1. A signed hard copy of the review reports shall be forwarded to the respective commander's office, through the chain of command.
- 2. Commanders shall:
  - a. Scan and save the hard copy of the Review Report in the District/Unit electronic files.
  - b. Keep the signed hard copy of the review report on file.
  - c. Forward the review reports electronically to their respective Deputy Chief.
- 3. Deputy Chiefs shall:
  - a. Review all reports.
  - b. Forward the electronic version to the Inspection Unit for archiving.
- D. The discovery of irregularities may not necessarily result in discipline, but may instead be used as a training opportunity. Misconduct and/or repeated violations or irregularities, which have been previously addressed, shall be forwarded through the chain of command to the respective Deputy Chief with conclusions and recommendations.

# VII. Secondary Employment

- A. Use of the WCS while working authorized secondary employment is recommended but not required.
- B. Officers choosing to wear their WCS at secondary employment shall:
  - 1. Ensure the WCS is charged and ready for use during their next tour of duty.
  - 2. When tagging captured media from secondary employment, use Secondary Employment as the title.
  - 3. Place the WCS into the ETM slot for uploading of captured media and charging of the unit at the end of their next scheduled Division tour of duty.
  - 4. Adhere to all WCS requirements while working secondary employment.

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# VIII. Media Storage and Access

- A. All captured media shall be uploaded from the ETM and stored at evidence.com according to the City of Cleveland records retention policy.
- B. Officers shall not use any recording device to record captured media (still pictures, audio, and/or video) from evidence.com or Evidence Sync.
- C. Officers shall add notes to captured media stating the reason for each view of captured media (e.g., completing report, court preparation review, use of force).
- D. Officers are encouraged to note video that they feel may have training value. A Form-1 shall be completed stating the reason and emailed to the OIC of the Training Section for supervisory review and assessment of training value.

# IX. Access and Public Records Request

- A. All captured media is an official record of the Cleveland Division of Police. Officers accessing, copying, or releasing any captured media for any purpose other than law enforcement related is strictly prohibited and shall subject the officer to discipline. All requests to exhibit, display, or demonstrate the WCS to outside parties shall be directed to the Chief's Office.
- B. Captured media obtained in Cleveland Hopkins International Airport shall not be released until reviewed and approved by the Transportation Security Administration, Federal Aviation Administration, or the United States Department of Homeland Security.
- C. The Mobile Support Unit is responsible for reviewing and redacting recordings in coordination with the Law Department and pursuant to state public records laws. The Mobile Support Unit shall also screen and forward requests for any law enforcement purpose (e.g., court, case files, and supervisory investigations).
- D. Unusual or exceptional incidents related to law enforcement activities are often the subject of heightened public curiosity and interest. However, officers are strictly prohibited from allowing persons outside of law enforcement to view or listen to any media captured by the WCS or any other Divisional evidence capture system without prior authorization from the Chief.
- E. Unless otherwise directed by the Chief, no video and/or audio recordings captured on-duty shall be disseminated outside of law enforcement. Officers shall refer all non-Divisional requests for captured media to a public records request.
- F. The Office of Professional Standards (OPS) shall be provided access to requested video without having to file a public record request. Requests from OPS shall be forwarded to the Mobile Support Unit.
- G. The public may request captured media through a public records request. Release of any captured media will be in accordance with the Ohio Public Records Law.

- X. Categorizing and Retention of WCS Captured Media
  - A. Captured media that an officer believes needs to be retained longer than the retention period shall be documented in a Form-1. The officer shall describe the reason and forward through the chain of command to the Mobile Support Unit.
  - B. Officers shall use the following categories to assist in maintaining and filing captured WCS media:
    - 1. Homicide/Sex Crimes (permanent retention).
      - a. Dead body investigations.
      - b. Sexual assault investigations.
      - c. Canine contacts.
      - d. Motor vehicle crashes with fatalities.
    - 2. Critical Incidents (retention of five years).
      - a. All motor vehicle crashes.
      - b. Any use of force incident.
      - c. All arrests.
      - d. Complaints of misconduct.
      - e. Search warrant video.
      - f. Felony crimes.
      - g. Investigative detentions.
      - h. Accidents involving city property (Injury to Person/City Property).
      - i. Pursuits (vehicle and foot).
    - 3. Misdemeanors, Traffic Stops, Citations, and Citizen Encounters (retention of two years).
      - a. Misdemeanors.
      - b. Citations issued without and arrests (UTTs/MMs).
      - c. Citizen encounters where none of the other category criteria apply.

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- d. Traffic stops.
- e. Alarms with citizen contact.
- f. Captured media that does not fall into any of the above categories.
- 4. Administrative and Alarms (retention of ninety days)
  - a. Alarms without citizen contact.
  - b. Start of tour vehicle inspection recordings.
  - c. End of tour vehicle inspection recordings.
- 5. Fatal and Non-Fatal Overdoses (permanent retention).

# XI. Training

- A. Officers assigned a WCS shall successfully complete training on all WCS directives and instructions (e.g., inspection, start up, use, shutdown, tagging, and upload).
- B. All WCS training shall be conducted by the Mobile Support Unit.
- C. The Mobile Support Unit is responsible for identifying areas related to the WCS where additional training, guidance or potential changes are needed to this order.
- D. Additional and continuous training will be provided to address changes in technology, legal standards, and policies or procedures.

THIS ORDER SUPERSEDES ANY PREVIOUSLY ISSUED DIRECTIVE OR POLICY FOR THIS SUBJECT AND WILL REMAIN EFFECTIVE UNTIL RESCINDED OR SUPERSEDED.

CDW/rcs Bureau of Compliance Attachments