



**BODY-WORN
CAMERA**
POLICY AND IMPLEMENTATION PROGRAM

Understanding the Benefits of Compliance Checks and Audits

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Meeting Logistics



- Recorded meeting
- Muting
- Chat questions
- Polls
- Resources

Introductions



Scot Haug

Chief of Police (retired)

Post Falls, ID, Police
Department



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Session Objectives



- Understanding the difference between a “compliance” program and an “audit” program
- Compliance Program
 - Why is it important?
 - Key components
 - Who should do the checking?
 - What should they be looking for?
 - What should be done with what is found?
- Positive outcomes of an effective compliance and auditing program

What's in a Name? “Compliance” vs. “Audit”

- No universally accepted process definition for law enforcement and BWCs
- It's what you do, not what you call it, that's important
- Define whatever terminology you use
- However, there are two separate processes

What's in a Name?

“Compliance” vs. “Audit”



- Compliance
 - May be referred to as a monitoring, reviews, compliance checks, etc.
 - Completed by a supervisor, agency level, or both.
 - Ensuring policies and procedures are being followed.
 - Are we doing what we said we would do?

Poll Question

Does your agency conduct
“compliance” checks?

Yes

No

What's in a Name?

“Compliance” vs. “Audit”



- Audit
 - Looking at the “compliance” program processes and documentation.
 - Verification that the agency goals and objectives are met.
 - Is our program working like we think it is?
 - Written documentation is important!

Poll Question

Does your agency conduct “audits?”

Yes

No

Poll Question

Are you confident and satisfied with your current compliance and auditing processes?

Yes

No



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COMPLIANCE



Why a “Compliance” Program Is Important



Why a Compliance Program Is Important



- BWCs document everything your officers do or fail to do; There's now a visual record
- Ensures evidence is being captured
- Protects your officers
- Protects the agency
- Validates your commitment to your community and agency values
- Enhances transparency and accountability
- Helps manage performance
- Validates and supports training

Why a “Compliance” Program Is Important



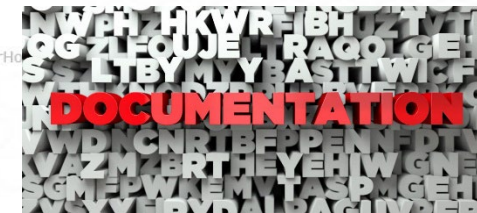
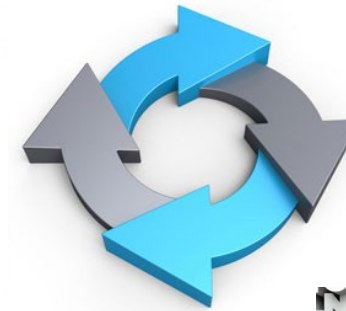
*Your organizational
culture is being
captured!*

Program Scope: What Are You Attempting to Learn?

- Is your agency operating as desired?
- Are you following all policies but especially your BWC policy?
- Are organizational culture and core values reflected in what you see?
- Have all officers been properly trained or are their training gaps?
- Are you complying with the law?
- Can you identify risks to the agency?

Program Components

- Policy: It's the foundation
- Process:
 - Who is looking?
 - At what level?
 - What is being looked at?
- Process documentation
- Feedback and follow-up action



Poll Question

At what level(s) does your “compliance” program operate?

Supervisory level only

Agency level only

Both levels

None

Levels of “Compliance” Review



Consider two levels:

- Supervisory



- Agency



Supervisory Review



- Policy compliance
- General performance
- Behavior
- Knowledge
- Tactics
- Application of law
- Officer safety
- Communications skills
- And the list goes on....Essentially, what supervisors always have looked at



Supervisory Review



- “X” number of videos
- “X” amount of length
- “X” number of times a month
- Looking for “X” (directed from the agency)
- Documented and forwarded

This level of review should be considered a first-line supervisory tool and not regarded as an agency level compliance process

And it doesn't guarantee policy compliance!

Agency Review Process



- BWC activation and deactivation policy compliance
- All other policy compliance
- Video content for review and analysis
- Organizational culture
- Operational effectiveness
- Risk avoidance, mitigation, or elimination



Agency Review



- Designated agency level person or section
- Looks at “compliance” from the viewpoint of the agency; risk management
- Uniform compliance across the agency
- Size of agency is immaterial
- Expectations are that it is being done, so have a process
- Directing supervisory review criteria

Agency Review



- Integrating agency sections such as detectives and professional standards in the process. Most importantly...the chain of command
- Managing the reporting and feedback mechanisms
- Process documentation

But Wait...
**THERE'S
MORE!**



- Don't confuse the process of compliance with a process for discipline
- Some of what is found may lead to discipline based on severity
- The compliance process is about making the agency better
- However... policy, without policy enforcement, isn't really a policy
- It's a balancing act for the agency



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AUDITS

What is an Audit?

- Examination or inspection of documentation and processes
- Verification
- Report



Why Is It important?

Avoid these...



Validate these...



Why Is It important?

- Ensures effective operation of the “compliance” process
- Validates compliance with policy, procedures, and laws
- Instills confidence in functions
- Aids in maintaining and enhancing community trust
- Due diligence

Who Does Them?

Internal



Acceptable

External



Best Practice

*Recommend audits be done
once a year at a minimum*

Poll Question

Are your “audits” done internally or externally?

Internally

Externally

Both

What Are They Looking For?



- Depends on the “compliance” program
- Must look at all processes, parties, and documents
- SWOT
- Recommendations
- Are we doing what we say we are?

What to Do With What Is Found



- Review the findings
- Determine how to correct deficiencies
- Determine how to maintain or enhance strengths
- Act
- Document
- Integrate into existing risk management processes
- Provide feedback to the organization
- Provide feedback to the community

Poll Question



How often are your “audits” done?

More than annually

Yearly

Longer than yearly

Positive Outcomes of an Effective “Compliance” and “Audit” Program



- Finding the “landmine” before it explodes
- Finding the “hidden gems”
- Validation of agency policy, operations, and organizational culture
- Validation for the officers, agency, and community



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Resources



- BJA Body-Worn Camera Toolkit (<https://www.bja.gov/bwc>)
- Getting started guide (<https://www.bja.gov/bwc/topics-gettingstarted.html>)
- TTA website (www.bwctta.com)
- BWC subject matter experts (<https://bwctta.com/Ask%20a%20BWC%20Expert>)
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