

EXTERNAL REVIEW
of the
Northwestern University
Department of Safety and Security
Findings and Recommendations

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OVERVIEW

ABOUT THE REVIEWERS

Riley Safer Holmes & Cancila LLP (RSHC) is a client service-oriented law firm with an organizational focus in diversity and inclusion which has represented a range of educational institutions through public scrutiny, government inquiries, intellectual property disputes, and high-profile litigation. RSHC conducted a community engagement analysis led by Patricia Holmes, a former judge and Assistant U.S. Attorney, who was the special prosecutor investigating police conduct in the Laquan McDonald case and the inaugural chair of the Illinois investigatory commission of police misconduct.

Security Risk Management Consultants, LLC (SRMC) is an independent security consultancy founded in 1989 that provides vulnerability assessment, master planning, crisis plans and emergency procedures, and project and program management support services. SRMC conducted an operational assessment of the Department of Safety & Security led by Paul Denton, a nationally recognized security expert who was formerly the police chief at The Ohio State University.

CHARGE TO THE REVIEWERS

The traumatic murder of George Floyd in late May 2020 by a white Minneapolis police officer led to a period of heightened awareness and escalating concerns nationwide about the scope and conduct of officers' duties, including the role of university public safety services.

The national debate led to discussions on the role of Northwestern's own Department of Safety and Security (DSS). This spurred calls, especially from students, faculty and alumni, to reexamine the role of campus safety, particularly with respect to actions viewed as having a disparate impact on students, staff, and faculty of color.

In June 2020, Northwestern issued a set of commitments related to [social justice](#). Among these was a review of the Department of Safety and Security:

"We will reexamine all of [Safety and Security's] approaches and functions, including its use of force policy, in particular relating to reporting protocol and impartial third-party review; its bias-free policing policy, to improve accountability; and law enforcement professionalism standards."

Shortly thereafter, the university retained two consultants to complete independent, external reviews and then to publish a joint report of findings and recommendations.

- **Riley Safer Holmes & Cancila (RSHC)** conducted a community engagement analysis. They were asked to synthesize stakeholders' perspectives about their interactions with and feelings about DSS, along with their thoughts and ideas for desired community safety improvements. RSHC was not retained to review or investigate DSS itself or to solicit the Department's responses to stakeholder feedback about DSS.
- **Security Risk Management Consultants (SRMC)** conducted an operational assessment of DSS in Evanston and Chicago relative to reasonable, appropriate, and acceptable standards and benchmarks.

The task given to the consultants was to incorporate stakeholder feedback, analyze available data sources, and develop potential actions for university leadership to consider. The task of deciding whether to enact any of these potential actions, as well as the development of a longer-term roadmap, would fall to Northwestern leadership or their designees.

The external reviewers' findings and subsequent recommendations are detailed in the following report. Where findings and recommendations overlapped, joint recommendations were made. Each external reviewer also made additional recommendations arising from their assigned analysis. The two reviewers conducted wholly separate data gathering methods and analyses, but they collaborated to write this report and to synthesize findings. There were no significant conflicting findings in the analyses of the reviewers.

EXECUTIVE SUMMARY

Two external consultants were tasked by Northwestern University to evaluate the Department of Safety & Security's (DSS) community engagement and operations. The separate reviews studied documents, policies, and data. The consultants also interviewed a range of campus and community stakeholders with an emphasis on hearing the voices of Black students.

The operational review found that DSS, which operates 24 hours a day, 7 days a week, 365 days a year, generally is a well-managed campus public safety and security operation. There are some opportunities to improve or update policies and practices to mitigate security risks.

However, both the community engagement and operational review found stakeholders broadly agree there is an urgent need for systemic change in campus safety practices. Many people of color, particularly Black students, feel pain and fear when seeing or interacting with a campus safety officer. Many Black stakeholders view Safety & Security officers as threats to their safety, and do not perceive a distinction between Northwestern's officers and those from Chicago or Evanston.

These feelings are not necessarily the result of specific interactions or experiences with Northwestern's Safety & Security personnel but can also arise from personal experiences with other officers and the history of security misconduct nationwide against people of color. The disparate impact that security presence has on Black stakeholders is particularly unsettling on a university campus where students live, work, learn, and gather with their friends. It is through this lens that some stakeholders' desire for defunding and abolition must be viewed.¹

Reviewers heard a range of ideas of what a different model of campus security could look like, including some calling for completely defunding or abolishing security personnel functions. Most stakeholders, however, expressed an expectation for a continued response to extreme or emergency circumstances as well as more routine service requests,² regardless of how the university reconfigures its security operations.

This review provides the university community an opportunity to offer input on what the next iteration of campus safety should look like, with a particular emphasis on how it is experienced and perceived by Black and marginalized stakeholders.

¹ The demand to "defund the police" is a call to reduce or remove funding from police departments, limit or remove their scope of responsibilities, and reallocate some or all resources typically designated for traditional policing to fund community interventions and support resources that are perceived to more equitably and effectively address unsafe conditions and reduce crime. See, Black Lives Matter, [What Defunding the Police Really Means](#).

² In 2019, the NUPD received approximately 60,000 calls for service, averaging more than 165 calls per day. More than half of these calls were requests to check the physical security of buildings and facilities, foot patrol to deter incidents, and security alarm issues. See *Northwestern University Department of Safety and Security Overview*, p. 8 (November 2020).

The findings and recommendations in this joint report are meant to provide the university with options to consider as it develops a path forward. The report centers on three major themes.

1. Rebuild trust through community engagement

Stakeholders broadly perceive Safety & Security's approach has trended over time towards law enforcement rather than community engagement, and this has played a part in some stakeholders' distrust in campus safety personnel.

- **A pivot towards community engagement** – such as proactive outreach, educational programming, and clear and consistent communication about Safety & Security services – can rebuild trust and legitimacy in current safety personnel, while the university makes a more systematic change to how it handles campus safety.
- **Updates and revisions to the Safety & Security mission statement** would acknowledge and articulate the need to change, as well as make clear the department's intent and plans to do so.

2. Redirect resources towards more appropriate responses

There is broad stakeholder consensus that at least some functions currently fulfilled by Safety & Security should be conducted by alternative means, especially regarding student mental health responses.

- **Redirection of mental health** responses from Safety & Security, and in tandem **additional resources** towards mental health experts, would allow mental health professionals to be the first and potentially only group that interacts with students in health and wellness incidents.
- Completing a **deeper strategic workload assessment** on Safety & Security's activities would underpin a fully informed decision on which activities should be reassigned to other university functions.
- The **formation of a faculty research committee on public safety** would leverage Northwestern's eminent faculty experts to help inform a new evidence-based campus safety model.

3. Increase accountability and transparency of campus security

A number of stakeholders, particularly Black stakeholders, expressed a lack of trust in Safety & Security stemming from perceptions of being treated differently in interactions with campus safety officers and feeling like Black students lack a voice in shaping DSS practices and policies. There was a desire among some stakeholders for greater transparency into public safety initiatives and practices, and for better communication on what changes were being implemented.

- **Increased accountability for Safety & Security overall**, with a structure in place to coordinate and share information on efforts to change, would help rebuild trust the university leadership and DSS are moving towards for a more effective and equitable public safety function.
- **A policy on the use of racial identifiers in campus crime notices**, and potentially eliminating usage altogether, would reduce discretion in including information that could perpetuate bias.
- **Revisions to the Safety & Security Code of Ethics and Code of Conduct** to expressly prohibit association with hate or extremist groups, and then to implement a compliance method, would allow for additional accountability on officer character and conduct.

- **An independent and more transparent complaint reporting process** that removes DSS from leading the report intake, investigation, and discipline process for officer misconduct would speak to concerns that complaints are not being addressed. At a minimum, the process as it currently stands should be updated and codified.
- **Improved training for Safety & Security on unconscious bias** could help reduce incidents where stakeholders report feeling unfairly treated based on race.
- **Gaining accreditation**, and the accompanying regular documentation and reviews by an outside agency, would elevate standards on life, health, and safety procedures.

Each of the recommendations by themselves likely would be ineffective in achieving the level of changes needed for all campus community members to feel safe and welcome at the university. When the issue is addressed, however, on multiple fronts, the potential for success is much greater. Many stakeholders believed their trust can be increased over time and equitable public safety can be achieved on campus if university leadership demonstrates a commitment to change through expedient, impactful actions.

METHODOLOGY

The two separate analyses were based on multiple data sources, including over 80 community conversations and focus groups conducted by the two reviewers collectively. These discussions were with students, faculty, staff, university leadership, alumni, and local law enforcement officers. Particular effort was made to seek feedback from Black student groups and with student activists (NU Community Not Cops).

Both reviewers received full cooperation from the university and Safety & Security leadership to speak with stakeholders and to access data.

COMMUNITY ENGAGEMENT (RSHC) ASSESSMENT METHODOLOGY

Prior to conducting the stakeholder interviews, RSHC reviewed university and department policies and other documents relevant to its assessment of DSS's community engagement.

- Literature on abolition, emerging resources on best practices for public safety, and the findings of peer universities examining similar concerns
- Historical documents describing Black students' experiences with campus security
- University leadership's recent communications with stakeholders on social justice issues
- Transparency reports, crime notices, call services reports, and data on student well-being and social justice initiatives
- University and Safety & Security policies and procedures, including those related to student protests and to mental health or wellness checks

RSHC was not tasked with reviewing DSS's internal operations but was updated on SRMC's findings about DSS's internal operations.

Stakeholders Consulted By RSHC

Between September and December 2020, RSHC conducted over 40 community conversations and focus groups to assess stakeholders' views on the quality and effectiveness of DSS's community engagement. The initial list of stakeholders to be interviewed were identified by the university and included members of Northwestern's leadership team, undergraduate and graduate students, alumni, faculty members, administrators, staff, a former member of DSS, and representatives from the Evanston and Chicago Police Departments and the police accreditation commission. Particular consideration was given to speaking with Black students. Stakeholders were also asked by consultants to recommend other people that should be interviewed.

At the beginning of each session, in order to encourage frank and open discussions, RSHC informed the interviewees that the information they provided during the interviews would be used solely for the purpose of reporting their feedback on the Department's community engagement and that their specific statements would not be attributed to them by name. Stakeholders were asked to discuss the nature and extent of their interactions with DSS officers, their perceptions of the DSS, and their opinions on policing and community safety expectations.

RSHC Interviews for Community Engagement Review

- **Students**
 - For Members Only
 - NU Community Not Cops
 - Student-athletes
 - Black Law Students Association
 - Kellogg Black Management Association
 - NU College Republicans
 - Associated Student Government (invited but no response)
 - Feinberg Black Medical Student Group (invited but no response)
 - Black Graduate Student Association (invited and declined)

- **Alumni**
 - NU Black Alumni Association

- **Senior Leadership**
 - Provost
 - Interim Chief Diversity Officer and Director of Women's Center
 - Director of Sexual Misconduct Response & Resources/Title IX Coordinator
 - Senior Vice President for Business and Finance
 - Vice President for Human Resources and Chief Human Resource Officer
 - Interim Director of Learning & Organization Development, Human Resources
 - Executive Director of Neighborhood and Community Relations

- **Student Affairs**
 - Vice President of Student Affairs
 - Interim Dean of Students
 - Executive Director of the Norris Center, Student Affairs
 - Executive Director of Campus Inclusion & Community
 - Director of Multicultural Student Affairs
 - Director of Social Justice Education

- **Athletics**
 - Deputy Directors of Athletics

- **Deans**
 - Vice President of Medical Affairs and Dean of the Feinberg School of Medicine
 - Vice Dean for Diversity and Inclusion, Feinberg School of Medicine
 - Associate Dean for Diversity, Inclusion and Student Support, Feinberg School of Medicine
 - Dean of the Bienen School of Music
 - Dean of The Graduate School
 - Dean of the McCormick School of Engineering

- Associate Dean of Graduate Studies, McCormick School of Engineering
 - Dean of the Medill School of Journalism, Media, Integrated Marketing Communications
 - Dean of the School of Communications
 - Chief of Staff, School of Communications
 - Dean of the School of Education and Social Policy
 - Dean of the School of Professional Studies
 - Associate Dean, Inclusion & Engagement, the Pritzker School of Law
- **Library**
 - Associate University Librarians
 - Library Security Assistant and Security Coordinator
 - Library Customer Service Supervisor and Representative, Access Services Department
- **Faculty**
 - President of the Faculty Senate and Professor of Strategy, Kellogg School of Management
 - NU College Republicans Advisor
 - Director of the Northwestern Neighborhood & Network Initiative (N3)
- **Accreditation**
 - Regional Program Manager for Commission on Accreditation for Law Enforcement Agencies (“CALEA”)
- **Local Law Enforcement**
 - Former DSS officer
 - Chicago Police Department, Deputy Chief (Streeterville)
 - Evanston Police Department, Chief and Deputy Chiefs

SECURITY OPERATIONS (SRMC) ASSESSMENT METHODOLOGY

The operational review consisted of a comprehensive document analysis complemented by on-site observations and stakeholder interviews. The materials reviewed included:

- Documents on Safety & Security’s mission, policies, operating procedures, budget, event security plans, and reports filed after incidents
- A budget summary of the department
- Transparency reports, crime notices, call center reports, and communications content
- An on-site visit to observe operations, facilities, personnel, and equipment, and to shadow a patrol

The assessment was supplemented by email correspondence, individual phone calls, follow-up calls and external research.

Stakeholders Consulted By SRMC

SRMC conducted over 40 interviews and meetings both virtually and in person between September 2020 and December 2020. Among those involved in direct discussions were administrators, key stakeholders, and other individuals representing students, faculty, staff and the community of the Evanston and Chicago campuses.

While the scope of the assessment was focused on the operational effectiveness of the DSS, SRMC acknowledges that there are many voices on campus. All have valuable perspectives on the role of campus safety personnel in society, particularly those who may be hurt or are fearful, anxious, or uncomfortable based on experiences with law officers.

SRMC Interviews for Operational Review

** Member of the Behavioral Consultation Team (BCT)*

- **Provost**
 - Provost
 - Associate Provost for Operations and Facilities
- **Senior Vice President for Business and Finance (SVP)**
 - Senior Vice President for Business and Finance
 - Units reporting to the SVP
 - *Risk*: Senior Associate Vice President and Chief Risk and Compliance Officer
 - *Budget*: Senior Director of Budget and Planning
 - *Facilities*: Senior Director of Facilities Operations
 - *Human Resources*: Director, Human Resources Business Partners, Consulting & Policy *
 - *Human Resources*: Human Resources Business Partner
 - *Safety & Security*: Leadership and officers at all ranks *

- **General Counsel**
 - Associate General Counsel #1
 - Associate General Counsel #2 *

- **Student Affairs**
 - Vice President of Student Affairs
 - Interim Dean of Students
 - Executive Director of the Norris Center, Student Affairs
 - Interim Executive Director of Clinical Services (Counseling and Psychological Services) *
 - Director of Residential Services
 - Director of Student Conduct *

- **Equity**
 - Associate Vice President for Equity
 - Interim Assistant Vice President for Equity and Title IX Coordinator *
 - Director, Equal Opportunity and Access
 - Director, Sexual Misconduct Response and Resources, Title IX Coordinator

- **Chicago Campus Schools**
 - *Kellogg*: Senior Director of Facilities
 - *Feinberg*: Executive Director of Research
 - *Pritzker*: Assistant Dean of Facilities and IT

- **Other University Units**
 - *Athletics*: Associate Athletic Director of Event Management
 - *Research*: Executive Director, Office of Research Safety

- **Northwestern Memorial Hospital**
 - VP of Operations, Northwestern Memorial Hospital
 - Director of Security Services

- **Accreditation**
 - Regional Program Manager for Commission on Accreditation for Law Enforcement Agencies (“CALEA”)

- **Allied Universal** (contract security firm)
 - VP of Operations, Allied Universal

- **Local Law Enforcement**
 - Chicago Police Department, Deputy Chief and Commander (Streeterville)
 - Evanston Police Department, Chief and Deputy Chiefs

JOINT RECOMMENDATIONS

Although Riley Safer Holmes & Cancila (RSHC) and Security Risk Management Consultants (SRMC) conducted separate reviews with different focuses, the external reviewers found considerable overlap in their findings. Therefore, some recommendations are made jointly with discussion of findings both from the community engagement perspective and from the security operations lens.

A. Reallocate Mental Health Responses and Resources from Safety & Security to Mental Health Experts

Community Engagement (RSHC) Assessment Results: Mental Health Response

There are few instances in which students' feeling of safety is more important than when experiencing mental health distress.

One of the most consistent concerns heard from stakeholders is the role DSS public safety officers play in responding to mental health crises and student wellness checks (some form of outreach when there is a cause for concern). There is a general consensus across all stakeholder groups that methods for reducing officers' frontline role in responding to mental health incidents and wellness checks should be developed.

Stakeholders stated that those responding to assist students should be licensed healthcare and mental health providers and those with whom students are most likely to feel confident. When public safety officers serve as the frontline responders during these situations, it creates a risk that their mere presence may exacerbate some students' medical needs and trigger fear, trauma, and embarrassment. Similarly, other stakeholders shared that public safety officers sometimes conducted wellness checks by going to students' residences, which can create discomfort and distress in students who already fear law enforcement.

Since some of the interviews with stakeholders, DSS and Student Affairs have modified university procedures. Beginning Fall 2020, DSS no longer makes routine wellness checks for students. Instead, if there are no immediate risks, Student Affairs first will contact the student's emergency contact to verify that the parties have connected with the student and to confirm that the student is safe. DSS is now only contacted for mental health concerns and wellness checks if there is an immediate risk of self-harm or injury to the student or a risk of harm to others, including the Student Affairs staff conducting the wellness check. Therefore, steps have recently been taken to assist with the stakeholders' concerns. However, additional resources or staffing may be necessary to extend this model when students return in even greater numbers to campus after the pandemic.

Students also expressed concerns over the embarrassing and carceral experience of being transported to the hospital in a marked patrol vehicle car as a result of mental health distress or excessive drug or alcohol use. Additionally, stakeholders expressed concern regarding the circumstances under which it is appropriate for officers to use restraints on students who are having mental health issues. Student Affairs notes that transport back to campus from the hospital after receiving treatment was amended in Fall 2020 and is now conducted by Lyft using a voucher.

Unlike with a transport to the hospital, a student leaving the hospital presumably does not pose an immediate risk for harm to themselves or to the Lyft driver.

In 2019, the university formed a Task Force on Student Well-Being to gain a better understanding of student sentiments related to well-being needs and to develop strategies for improving student well-being, as it relates to mental and physical health. The Task Force prepared suggestions in the spring of 2020 that summarized its strategies for consideration. The Task Force's initial work did not focus on the DSS's role in mental health incidents.

Security Operations (SRMC) Assessment Results: Mental Health Response

The operational assessment focused on the governance and membership of the Behavioral Consultation Team (BCT). The multi-disciplinary team is the central point of contact to receive community concerns regarding behavior that is threatening or concerning to the individual or to the community. The BCT assesses the risk and implements intervention actions. Student, faculty, and staff cases may all be referred to the BCT.

The analysis found that the BCT is a robust and comprehensive violence prevention program that has well-defined guiding principles, mission, and resources. Members are drawn from Counseling and Psychological Services (CAPS), Student Affairs, Equity, Faculty Wellness, Safety & Security, Human Resources, and General Counsel.

As the facilitator for the BCT meetings, the Deputy Chief of Police develops the meeting agenda with input from team members, acts as moderator for the team's discussion and assessment for matters presented to the BCT, and coordinates case management. The Deputy Chief of Police also provides the Safety & Security perspective to the team.

Several key constituents and ancillary members of the BCT and campus community expressed a preference to have a professional psychologist or civilian leading this team instead of the Deputy Chief of Police because of a possible conflict of interest and fear of disclosing information to a law enforcement official. The view is that Safety & Security should be a part of the team but not leading it.

DSS previously had a licensed psychologist that reported to the Deputy Chief of Police and, prior to a budget reduction, this position played a valuable role as the facilitator of the BCT. Currently, three licensed psychologists serve on the BCT, including the Executive Director of Counseling and Psychological Services.

There were also concerns expressed with having public safety officers transport students seeking mental health services to the hospital in marked patrol vehicles, given the embarrassing experience as referenced above in the community engagement analysis. This is a service provided by DSS for voluntary and involuntary student patients on the Evanston and Chicago campuses.

Members of the Behavioral Consultation Team (BCT)

Facilitator: Deputy Chief of Police, Safety & Security

- Counseling and Psychological Services (CAPS)
 - Executive Director
 - Director of Clinical Services
- Student Affairs
 - Interim Dean of Students
 - Assistant Dean and Director of Student Conduct
 - Assistant Dean of Students and Case Manager
 - Director of Residential Life
 - Assistant Director of Student Conduct
- Equity
 - Associate Director, Equity and Title IX Compliance & Deputy Title IX Coordinator
 - Director, Sexual Misconduct Response and Resources & Title IX Coordinator
- Faculty Wellness
 - Director, Faculty Wellness Program for Northwestern & Associate Professor, Department of Psychiatry & Behavioral Sciences, Feinberg School of Medicine
- Safety & Security
 - Commander of Investigations
 - Director of Planning and Program Initiatives
- Human Resources
 - Director, HR Business Partners/Consulting & Policy
 - Human Resources Business Partner
- General Counsel
 - Associate General Counsel

Joint Recommendations from RSHC and SRMC

- *Consider removing DSS as frontline responders even for more serious student mental health and wellness incidents.*

This means that DSS officers may still need to be present on the scene, but mental health professionals typically will be the first group, and potentially the only professionals, who interact with the students depending on the needs and the risk levels.

- *Consider the best resources to replace DSS officers as frontline responders in mental health incidents.*

This could include social workers, psychologists, counselors, paramedics, trained unarmed and plain-clothed community service officers, and trauma specialists. Many stakeholders expressed the need for at least some of the frontline responders to have clinical mental health expertise and risk assessment experience. Stakeholders also opined that the

responders need to be effective in communicating with students in distress and their family members, when necessary and permissible.

Increasing the number of mental health providers to replace DSS public safety officers' role in responding to mental health incidents serves another benefit as well. It is anticipated that there will be a growing number of stakeholders who need mental health services in light of the isolation and loss caused by the pandemic, national conflicts surrounding race, and other emerging issues.

- *Consider revising current DSS policies on mental health responses and developing an escalation protocol in partnership with Student Affairs.*

The escalation protocol can set forth when, if ever, it is appropriate for DSS public safety officers to become more directly involved in a student's mental health incident. Additionally, although the use of restraints is extremely rare, DSS should consider preparing more detailed guidance in its current policy for officers regarding when handcuffs or other restraints are appropriate, if ever, when responding to student mental health crises. This should include alternatives to having DSS officers in marked patrol vehicles conduct mental health transport unless there is a risk of violence or danger to people.

- *Consider reassessing the leadership and organizational placement of the Behavioral Consultation Team, including whether a licensed psychologist or civilian should be the facilitator. Public safety officers could continue to provide insight and support as members of the team.*

One option for evaluating recommendations on mental health support is for the university to leverage the Care and Coordination team or a similar group. The current Care and Coordination team meets weekly to identify students who may need additional support and coordinates campus support resources, including conducting wellness checks.

Harvard's and Yale's recent assessments of their security departments led to similar recommendations for groups to consider the appropriate role of campus security and other providers in responding to mental health needs. Specifically, Harvard's assessment resulted in a recommendation that the university form a facilitating group that would consider this issue, among others, and Yale's assessment noted the benefits of a "co-responder model" in which mental health professionals are part of the team that responds to student mental health crises.³

Some stakeholders expressed that they do not trust that the university will take action according to a timeline that reflects what the stakeholders perceive to be an urgent need for change. These stakeholders are wary of any plans that could be perceived as the university utilizing "just another committee." That concern must be balanced, however, with the need to ensure a well-planned approach to putting the right mental health resources in place and transferring responsibilities from

³ 21CP Solutions, "Re-Imagining Public Safety: Recommendations for the Harvard University Community & Police Department," Recommendation 1.4, pp. 21, 29-30 (December 2020); 21CP Solutions, "An Assessment of the Yale Police Department," Recommendation 5.23, p. 54 (March 2020).

the DSS in a safe and effective manner. A task force that meets frequently, acts with transparency, seeks feedback across all stakeholder groups, and provides frequent updates to stakeholders on its progress and decisions will help mitigate the concerns about inaction.

The university's Community Safety Advisory Board also can assist the task force to ensure that students have a voice in the process. The Community Safety Advisory Board was formed by the university in Fall 2020 and will play a pivotal role in the university's community safety initiatives. The Board is led by Dr. Clyde Yancy, who, among other roles, serves as Vice Dean for Diversity and Inclusion at the Feinberg School of Medicine. The Board's membership will include students, faculty, and staff who will make recommendations to the university's leadership on how to improve well-being on campus. As stakeholders expressed, it is critically important for students of color to have a voice in developing the university's community safety policies and procedures, and this Board provides an opportunity for students to have an integral role in the process.

B. Pivot to a Community Engagement Approach to Campus Safety

Community Engagement (RSHC) Assessment Results: Community Engagement Approach

Although stakeholders disagreed about the appropriate scope of the Department of Safety & Security's (DSS) responsibilities on campus, there was more agreement that proactive efforts to engage with students in positive ways could be improved and welcomed.

Administrators and some students said they would like to see campus safety officers engage more frequently with students in ways that demonstrate that DSS is not there solely to handle crises and crime prevention. Some students expressed that they primarily see DSS officers in their patrol vehicles and do not have a clear understanding of what services they provide, and therefore, do not view them as trusted members of the community who are there to help them. The perceived lack of communication and interaction outside of enforcement situations correlates with distrust in campus safety officers from some stakeholders. Reassigning staff and/or using a staffing assessment regarding DSS roles can increase community trust and legitimacy, as SRMC discusses later in its security operations analysis.

A number of stakeholders also stated that they felt the DSS was more effective with community engagement several years ago. There was a perception that there has been a decline in the frequency of DSS officers' foot patrols on campus (as opposed to patrol in vehicles), their efforts to hold meaningful conversations with students, and their sponsoring of joint DSS-student activities in partnership with residence halls and student organizations. This echoes SRMC's similar findings detailed in the section of this report about the DSS mission, as well as their discussion later on about the impact that budget and staffing reductions over the years have had on the level of outreach that DSS conducts.

At first glance, the interest in improved officer engagement with the community is seemingly at odds with some stakeholders' desire to defund and/or abolish campus safety functions or even a more general sense that the scope of campus safety has become too broad. Those who would like to see DSS be defunded would understandably not advocate for improved engagement with the DSS officers, at least in the department's current form.

However, community engagement does not refer to more officers on patrol. **Instead, community engagement is an approach to campus safety that builds and rebuilds trust through an emphasis on proactive outreach, educational programming, and clear and consistent communication about the services that DSS provides to the community.** This approach requires a balancing of interests and only can be successful if it is part of a multi-faceted approach to public safety.

Many stakeholders recognized that there are significant campus security concerns that must be addressed on a daily basis regardless of what DSS as a unit ultimately looks like. For example, the overview of Safety & Security published by Northwestern in November 2020, as well as the security operations external review discussed later in this report, both detail the approximately 60,000 calls for service handled by the department each year. Until the university determines and implements plans for more systemic change to campus safety, redirecting officers towards a focus

on community engagement balanced with enforcement, is a directional shift that some stakeholders felt would foster more a positive environment.

RSHC's assessment revealed that DSS does currently engage in a number of community outreach activities, including safety presentations to members of the Athletics Department,⁴ officer ride and walk along opportunities, crime prevention education, and self-defense training at campus fairs and events.

In order for DSS to effectively increase community engagement, both students and administrators expressed that there must be officers within the department to whom students can relate and with whom they see a benefit in communicating. For example, a number of students referenced their appreciation that certain officers previously with the department dressed casually and were visible at campus events, approachable, and open about their backgrounds and personal challenges, and self-critical about areas in which DSS could improve. One of these officers talked openly with students about her Queer Latinx identity. Another officer spoke openly with students about her experiences growing up in a low-income household and how she integrated that experience into her work. These types of transparent interactions demonstrate a commitment to establishing a genuine connection with the students, building trust, and offering support.

A member of the Evanston Police Department provided another example of effective community engagement. He shared how a fellow officer created a successful mentorship program for high school students called the Explorer Program, which provides an opportunity for students to learn about careers in law enforcement. He explained that the program has been extremely popular because the officer running the program has a disposition and communication style to which students can relate. Prior to the pandemic, DSS attended meetings of EPD's Explorer Program.

These examples demonstrate that community engagement and outreach within the Northwestern and neighborhood context can work if the right resources and people are in place.

Security Operations (SRMC) Assessment Results: Community Engagement Approach

Similarly to the RSHC analysis of community engagement efforts, stakeholders interviewed for the security operations review expressed that campus security "are not visible or out and about in their facilities" or interacting with the public. Many reported having favorable interactions with individual officers and commanders, but still contend that officers are not "visible" on campus. In contrast, some in Student Affairs noted that students do not feel comfortable seeing officers in the residence halls. There is clearly an expectation from some community members to have an appropriate campus safety presence, but those interactions with the community must be in a positive manner with a commitment to a more community engagement focused approach.

⁴ At the beginning of the academic year, DSS officers are invited by certain Athletics programs to meet with some of the student athletes. DSS informs student athletes about the scope of their services and discusses how they can be of support to the athletic programs. The administrators who shared this information stated that they would like to see this method of engagement extend to other students.

Some of the decrease in security visibility and of community engagement practices likely stems from budget and staffing reductions over the last several years. These reductions have occurred without a corresponding decrease in the number of university community members that DSS supports, and can, therefore, result in fewer community-engagement activities. Further details about these reductions are found in the university's Safety and Security Overview published in November 2020.

Reviewing the number of crime prevention programs in place prior to the pandemic, it appears that the department was doing a good job of offering a variety of crime prevention and personal safety options to their constituents. It was unknown how these programs are advertised and marketed.

Contingent on a staffing analysis, DSS could re-engage the internal "community building team," an initiative that involved a group of officers addressing the core mission of community engagement through crime prevention programs and community building on both Evanston and Chicago campuses. In reviewing the community building teams' initiatives, mission, reporting, and expected measured outcomes, SRMC sees this as a workable solution that helps articulate the value of safety and security in a campus setting.

Joint Recommendations from RSHC and SRMC

- *Consider designating a supervisory-level officer to be solely focused on community engagement.*⁵

Stakeholders expressed that this position should be filled by someone with the background and personality to effectively develop a rapport with the students and other stakeholders. This officer should engage with students, student groups, and other stakeholders on a regular basis to solicit ideas on how the DSS can effectively serve the community, address student concerns and questions about the DSS's duties and responsibilities, and develop plans for joint DSS-student/community activities (e.g., introductory meetings with student groups at the beginning of the academic year, safety seminars, and town halls).

Additionally, the supervisor should collaborate with other local organizations on joint community service and social initiatives (e.g., food and clothing drives, planned community conversations on high-priority topics, and officer walk-and-talks).

Finally, from an accountability perspective, the supervisor should advise on measurable expectations for individual officers with respect to their involvement in community engagement activities and meet quarterly with the Community Safety Advisory Board to share ideas and updates on current department initiatives.

⁵ The Chicago Police Department ("CPD") has a Commander of Community Policing, and the CPD has implemented numerous well-received community engagement initiatives under his leadership. For example, the CPD holds "community conversations" in every district, which involves the community picking three concerns they would like the CPD to address and after the discussions, CPD's progress in addressing those concerns is tracked over a year. Additionally, tactical officers are required to participate in one community engagement activity a week (e.g., bowling, art classes, etc.). CPD officers also do Walk-and-Talks in all districts where they walk down the street and discuss how to keep businesses, customers and residents safe. All of these events are typically well attended by community members.

- *Consider using a different format for patrol activities to encourage more interaction by the officers with the community.*

For example, foot or bike patrols can get officers out of their vehicles and meeting constituents.

- *Consider sending public safety officers and community safety officers (unarmed security personnel) to professional training on community engagement and crime prevention.*
- *Consider a fresh look at the types of crime prevention programs, delivery methods, and opportunities to interact with students, especially in residence halls, to deliver crime prevention messages and resources.*
- *Consider placing public safety officers in small, but visible, spaces within the community to create more opportunities for additional informal engagement.*

C. Update and Revise the Safety & Security Mission Statement

Community Engagement (RSHC) Assessment Results: Mission Statement

Multiple stakeholders shared their desire to hear the Department of Safety & Security (DSS) express a commitment to equity and change. They also wanted an acknowledgment that the officers have heard and understood the historical roots, as well as present fears and concerns, about campus safety practices expressed by students of color. Open and frank communication between the DSS and the student body is viewed as a necessary step to earning the trust of all students.

In addition to DSS expressing its commitment to improve directly to students through town halls and similar forums, stakeholders supported the idea of DSS revising its current mission statement. This would publicize the commitment to equity and demonstrate plans for equitable and just public safety policies and practices.

Security Operations (SRMC) Assessment Results: Mission Statement

The operational review took a deeper look at the DSS mission statement in the context of the university's mission statement. This provided an objective starting point into safety and security operations as defined not just by the mission statement but also DSS' publicly stated goals and objectives and the services it intends to provide.

It is vital that the mission, vision, and values guiding the DSS align with the academic mission of the institution and the institutional strategic plan. The University Mission statement reads:

"Northwestern is committed to excellent teaching, innovative research and the personal and intellectual growth of its students in a diverse academic community."

In pursuit of this mission, Northwestern University adopted a strategic plan in 2011 with four pillars: discover solutions, integrate learning and experience, connect the community, and engage globally. DSS' work should uphold the strategic pillar of connecting with the community, which encompasses inclusiveness, diversity, collaboration, and engagement in education.

The Department of Safety & Security's mission statement should capture the reason why it exists at the institution. Its current priorities, goals, and objectives can be summarized as:

- Service to the campus community and surrounding area
- A proactive approach to crime prevention
- Law enforcement carried out in a professional, courteous, and effective manner
- Trained officers with the ability to respond to the incidents most likely found on campus
- Community-oriented security applied through partnerships and education programs

Although both law enforcement and community engagement are included in the current mission statement, stakeholders generally perceived that DSS' practices had trended over time towards a more formal law enforcement approach. It is possible for DSS leadership, and consequently officers under their command, to over-rely on enforcement as the primary method for safety and order maintenance. The focus for the agency can then become one of legality versus legitimacy.

However, legitimacy is determined by public perception and grounded in collaboration and trust. Fostering legitimacy begins by articulating that commitment in the organization's mission statement.

It is vital to have the campus safety function partner across the university in support of education, compliance, and problem-solving. This helps to provide insight as to when and how the objectives of law enforcement and order maintenance can cause friction with educational and institutional objectives.

While one might conclude that the general goals and objectives for DSS are consistent with those of the larger institution, its mission, vision, and value statements seem to be out of date. According to the department manual, their current mission statement was crafted on or before 2002.

Joint Recommendations from RSHC and SRMC

- *Consider revising the Safety & Security mission statement and supporting material in a way that would speak to concerns raised by stakeholders and the reasons they gave for being unable to trust campus safety personnel.*

The mission statement and supporting material could cover:

- An acknowledgment that systemic change is needed
- A focus on ensuring the safety and security of all stakeholders
- The commitment to focus on and promote community engagement as a core philosophy and principle of the mission
- The commitment to prohibit discrimination and also foster more awareness of unconscious bias in the provision of its services and the details on how it is going to work on that goal
- A plan to hold officers accountable for any improper conduct
- A commitment to increasing transparency
- A plan to develop methods of effective and respectful communication between Safety & Security members and stakeholders
- A greater emphasis on principles such as education, diversity, protection of constitutional rights, integrity, and ethics

D. Improve Unconscious Bias Training

Community Engagement (RSHC) Assessment Results: Unconscious Bias Training

A number of stakeholders shared the perception that they were unfairly targeted by DSS public safety officers because of their race or at least felt the need to take additional precautions to avoid these types of encounters.

The most common complaint was that DSS officers seemed to disproportionately stop and question Black students, faculty, and administrators regarding why they were present in a particular university building or residence hall, particularly in the evenings or on weekends. Some of these stakeholders shared how they made sure to dress professionally or wear Northwestern-branded attire if they were entering a university building to avoid being questioned by DSS officers. Recognizing the impact that this experience has, particularly on Black students, one stakeholder stated, “It’s hard enough to do well at Northwestern without distractions. Having to worry about proving your belonging on campus to the police is a huge distraction.”

RSHC was not tasked with determining whether there is a documented disproportionate amount of interactions with Black stakeholders or if the interactions differ from interaction with other people. Therefore, this information is presented solely as a summary of what was shared through interviews. The Department of Safety & Security Overview report provided statistics on the racial breakdown of field and traffic stops on the Evanston and Chicago campuses, though it is possible there are interactions that do not rise to the level of a field or traffic stop but which stakeholders perceive negatively nevertheless.

Additionally, some stakeholders expressed their belief or experience that DSS public safety officers, or those perceived to be university-affiliated safety officers such as contract security, were disproportionately aggressive with students of color when responding to events, including student protests and noise complaints from parties and other social gatherings. Some students shared that they avoid gathering in groups to avoid being perceived negatively by law enforcement. The common denominator in these interactions is that Black stakeholders feel unwelcome and unsafe.

Many stakeholders believed the DSS officers could benefit from more frequent and/or effective training sessions related to unconscious bias, cultural sensitivity, de-escalation, trauma-informed policing, diversity and inclusion, and communication. One administrator recommended that the training sessions provide an opportunity for officers to reflect on and discuss the role bias may play in their interactions with others and the unique aspects of serving college students, including addressing issues through an educational and community-focused lens. Multiple universities are in the process of considering or implementing similar training programs, including Harvard, Yale, and the University of Iowa.⁶

⁶ 21CP Solutions, “Re-Imagining Public Safety: Recommendations for the Harvard University Community & Police Department,” Recommendation 2.4.2, pp. 41-42 (December 2020); 21CP Solutions, “An Assessment of the Yale Police Department,” Recommendation 5.25, pp. 56-57 (March 2020); Univ. of Iowa, *A Message From UI Leaders on Next Steps Following George Floyd Demonstrations* (Jun. 5, 2020).

Security Operations (SRMC) Assessment Results: Unconscious Bias Training

The security operations review delved into the kinds of training Safety & Security officers currently undergo. SRMC interviewed DSS administrators and examined documentation of recent training. The multi-year training plan includes the state required topics, firearms requalification, with additional training on subjects that are unique to the campus environment.

The Illinois Law Enforcement Training and Standards Board (ILETSB) establishes state-level training and certification requirements and administers the process of ensuring departments are compliant with training requirements. Topics include firearm qualification, use of force, CPR, and civil and human rights. A list is provided at the end of this section.

Safety & Security offers training exceeding state requirements. Topics include first aid, mental health, and procedural justice. Training officers on dealing with individuals in mental health distress and de-escalation techniques has been a high priority for the department. Recently, all DSS officers participated in mandatory de-escalation training to look for early signs of escalating behaviors as well as some basic de-escalation and empathy skills. All DSS officers have attended several courses delivered in person and virtually related to mental health.

Safety & Security Training Beyond State Requirements

Examples of recent training topics for officers beyond those required by the state:

- De-escalation
- Implicit bias and procedural justice
- Unconscious bias
- Community policing
- Sexual harassment
- Changing perceptions: a fair and impartial policing approach *
- Procedural justice: roll call training for law enforcement *
- LGBTQIA+ awareness
- Mental health policy
- Interacting with people experiencing mental distress
- Mental health and wellness
- Defusing difficult encounters
- Responding to individuals in crisis and de-escalation

* Provided by the US Department of Justice, Office of Community Oriented Policing Services.

Joint Recommendations from RSHC and SRMC

- *Consider ways to improve unconscious bias training for DSS officers.*

The university should consider ways to improve unconscious bias training in light of stakeholders' belief that the training has not been sufficiently effective to date.

Updates might include improving and broadening the content, length, and depth of the training programs, increasing the frequency of in-person training sessions, and increasing the degree of engagement and reflection required during the trainings.

In updating existing training and developing or identifying new training programs, DSS should continue to make use of resources available through Northwestern, such as the Northwestern Institute for Policy Research and the Illinois Law Enforcement Training and Standards Board.

Appendix: Illinois Law Enforcement Training and Standards Board (ILETSB) Training Mandates

Frequency	Topics
Upon hire	Basic hours for full and part-time law enforcement officers Mandatory firearms training Firearm qualification Naloxone Epinephrine administration (if carried) Prison Rape Elimination Act (PREA, by federal law)
Every year	Firearm qualification Law updates Use of force Hazmat Sheriffs/Chiefs and deputy chiefs (if applicable) K-9 narcotic detection (if applicable) Prison Rape Elimination Act (PREA, by federal law)
Every 2 years	CPR/AED, and Narcan if required by agency
Every 3 years	Constitutional and proper use of authority Procedural justice Civil rights Human rights Cultural competency Mental health awareness and response Reporting child abuse and neglect Officer wellness Trauma informed response and investigation of sexual assault/abuse
Every 4 years	Lead homicide investigator (if applicable) Standardized field sobriety testing (if applicable)
Every 5 years	Psychology of domestic violence

COMMUNITY ENGAGEMENT ANALYSIS RECOMMENDATIONS

In addition to the recommendations presented jointly by both reviewers, each external reviewer provided further recommendations based on their analysis. Riley Safer Holmes & Cancila's (RSHC) community engagement recommendations are detailed below.

E. Increasing Accountability to Advance Change and Transparency

Community Engagement (RSHC) Assessment Results: Accountability

A number of Black stakeholders expressed that they did not trust the Department of Safety & Security (DSS). They believed that DSS's accountability and the transparency of their actions and policy rationales needed to be improved.

These stakeholders referenced the following examples as adversely affecting trust:

- Interactions with DSS officers during and after protests and other incidents that they perceived as overly aggressive towards students of color
- A perception that DSS more frequently shut downs parties held by Black students than those parties held by white students
- A perceived higher frequency in campus security stopping Black students, administrators, and faculty members to question why they were in particular campus buildings
- A belief that DSS did not adequately address reported concerns about officer misconduct
- A perceived decreasing effort by the DSS to engage with students in a positive way
- A perceived lack of commitment by the DSS to public safety improvement efforts
- Perceived stricter social distancing enforcement by the DSS for students of color

Students expressed doubt that the DSS, acting alone, would be willing or able to achieve effective and equitable public safety and law enforcement. Other stakeholders expressed concern that Black students did not have a voice in shaping DSS practices and policies.

Stakeholders felt that DSS needs to demonstrate its commitment to taking all stakeholders' views and interests into account. They advocated for transparency on the details and rationale behind public safety initiatives and the anticipated timeline for such plans to be developed and implemented.

Structure to Lead Change Initiatives

As a result of these concerns, some stakeholders suggested that the university appoint one or more individuals to lead and coordinate the multi-faceted efforts in order for the university to implement an effective, equitable, and just public safety model. They shared that the leader(s) need to be trusted by Black stakeholders to advocate on behalf of their interests. They further expressed that the chosen leader(s) should be individuals who will be easily accessible to Black students. Some stakeholders recommended that the leader(s) have a presence in the Black House, in order to reaffirm this as an affinity space in which Black students can seek community as well as university level advocacy.

Both external reviewers agreed that the university's newly formed Community Safety Advisory Board is one step forward in addressing stakeholders' concern that Black students have a voice in developing plans for changes to campus security. Stakeholders pointed out, however, that the Board does not currently investigate complaints of misconduct, provide oversight for Department community engagement efforts, or coordinate change efforts or change information sharing on a campus-wide basis.

Process for Handling Complaints

Some stakeholders reported concerns about whether the process of investigating complaints about DSS operations and policies was sufficiently responsive, independent, and transparent.

For example, one administrator noted that she asked a member of DSS's leadership team to explain the justification behind a policy that she believed had a disparate impact on Black stakeholders, but the DSS administrator did not provide a rationale. Some stakeholders shared concerns that complaints were not fully investigated or addressed. Regardless of the veracity of these claims, these types of concerns seemed to contribute to stakeholders' general distrust of DSS' ability and desire to effectively implement better public safety measures.

At the time of data analysis, the DSS offered stakeholders an option for reporting "feedback on police services" on its website, which would be forwarded to the Chief of Police and with follow-up from a supervisor to discuss the issue and the investigation process. DSS has since disabled this function and the consultants agree with this action.

Existing options to redirect the complaint intake function include the EthicsPoint or Maxient systems, the Office for Equity, Human Resources, General Counsel, or the future Ombuds office, which the university is in the process of implementing. Outreach to the Chief of Police and/or supervisor could then be reserved for the purpose of consultation about appropriate resolutions.

Recommendations from RSHC

- *Develop a strong university leadership structure to advance Safety & Security change initiatives and community public safety improvements.*

The university should consider the best structure for advancing public safety changes, including:

- What university leadership structure for DSS change initiatives and campus safety initiatives will maximize stakeholder trust;
- Who is best suited to conduct periodic reviews of DSS's community engagement initiatives and its unconscious bias and related training programs and provide reports on progress to the university's senior leadership;
- Who should be tasked with investigating reported concerns about public safety officer conduct, conducting ongoing reviews of DSS's policies and procedures to identify any potential disparate impact on marginalized stakeholders, and ensuring there is sufficient transparency about DSS's change initiatives;
- How will the public safety efforts of the Community Safety Advisory Board, a group focusing on mental health response options, DSS change initiatives, the

Faculty Research Committee on Public Safety (see section 2 below), and the university-wide social justice initiative be coordinated; and

- How will stakeholders' public safety concerns be communicated to leadership and how will updates on public safety improvement efforts be shared with stakeholders.
- *Consider conducting an annual formal audit on the effectiveness of community policing and engagement practices and issue a public report.*

Surveys on campus security services could be part of these audits.

- *Consider incorporating community engagement metrics into officers' performance reviews.*

DSS should consider setting goals and metrics for officers' community engagement efforts and making them part of their performance reviews. Potential measures of community engagement include goals on how many community engagement activities each officer participates in per month. This also demonstrates a top-down commitment to community engagement. The criterion for community engagement could be set in consultation with the DSS leadership position dedicated to community engagement, Human Resources, and with the Community Safety Advisory Board.

- *Consider removing Safety & Security from the process of reporting, investigating, and disciplining safety personnel misconduct.*

Stakeholders are more likely to report concerns and to trust DSS more if they are aware of a formal, transparent, and independent process through which they can report their complaints or concerns about DSS officers and practices. The university offers this option through its EthicsPoint system, but the university should further consider ways to publicize these resources. The University also should consider modifying the EthicsPoint reporting categories for ease of use to create a separate reporting category for misconduct or concerns.

- *Consider expanding information-sharing resources on campus safety services.*

In an effort to increase information sharing about social justice initiatives, the university has developed a social justice website. As an additional supplement, some stakeholders suggested that the university hold periodic town halls to give the university community a forum for discussing thoughts and concerns about campus security-related issues. Other stakeholders expressed support for the DSS implementing a Frequently Asked Questions online resource, similar to the program recently created by the City of Evanston, to provide answers to questions about training and policies.

F. Formation of a Faculty Research Committee on Public Safety

Community Engagement (RSHC) Assessment Results: Faculty Research Committee

Students and faculty members pointed out that the university has many professors with expertise in public safety-related issues and policy, but they believed these resources were under-utilized by the university. As a result, they believed that Northwestern was missing an opportunity to be a thought leader in campus safety.

Stakeholders offered numerous issues that could be evaluated from an academic perspective by the university as part of its public safety initiative:

- The appropriate scope of officers' duties on university campuses
- The circumstances under which officers should be armed
- Whether there should be a rebranding of campus safety officers
- Whether campus officers should wear something other than traditional uniforms
- Who is best-suited to provide security at school events and enforce no contact orders
- Best practices for officer accountability.⁷

Recommendations from RSHC

- *Consider forming a Faculty Research Committee on Public Safety.*

The committee could evaluate public safety issues with a data-oriented approach, hold academic discussions, and publish literature on best practices and related findings. The Research Committee should work closely with and complement the Community Safety Advisory Board, which is tasked with evaluating the most challenging public safety issues from a community perspective. A faculty member who expressed interest in serving on this type of research committee noted that the DSS's cooperation in making relevant data easily accessible, such as traffic stop and service call information, would be helpful for the research initiatives to be effective.

⁷ As a comparative case study, the Committee should consider the safety procedures of the university's library. Library staff shared that the library's internal security team, comprised of full-time staff and student employees, is effective in addressing behavioral issues and violations of library policy within the space, often without the need to escalate concerns to the NUPD. They employ a customer service approach to security, wear plain clothes, regularly communicate with and assist library patrons, and engage in peer-to-peer interactions. In Northwestern's 2016 Final Report by the Black Student Experience Task Force, black students provided lists of the campus spaces in which they felt most comfortable. Among the highest ranking locations on the lists was the university's library. *See* The African American/Black Student Experience-Final Report, Black Student Experience Task Force, pp. 31, 38.

G. Develop a policy on the use of racial identifiers in Crime Notices

Community Engagement (RSHC) Assessment Results: Racial Identifiers in Crime Notices

The University periodically issues campus “Crime Notices” required by the Clery Act when certain serious incidents that present continuing potential harm occur within a defined geographical area. Demographic data, such as race, is sometimes shared about suspects. The current DSS policy states that “demographic data about the suspect(s) may be shared if provided by the victim or reporter and deemed helpful to prevent similar incidents from occurring.”⁸

DSS reports that, in practice, race and ethnicity are not the sole identifiers in a Crime Notice but could be included if reported or corroborated by available video, along with other relevant descriptors. Sometimes racial or ethnic identifiers are not included because they have not been reported or otherwise verified, an explanation that is not always made clear. However, even this practice on the use of race as an identifier in the Crime Notices could leave room for discretion.

Stakeholders felt it was unclear how and why racial identifiers are used in Crime Notices, and this seems to cause concern and distrust. Some stakeholders felt that providing the racial identifiers was rarely helpful in identifying the actual offender and instead promoted bias against persons of color. Others noted that the use of racial identifiers felt inconsistent and without apparent reason or context.

Some stakeholders felt that suspects were more often identified by race when they were Black, whereas it was less likely that a suspect was identified as white. However, it should be noted that a regular recipient of a Crime Notice would not know the race of a suspect and therefore could not know the number of times a suspect’s race was simply unknown.

Stakeholders believed the DSS should further consider whether ethnicity descriptions are ever needed in these reports and under what circumstances they add value. Some stakeholders recommended that if the victim did not know the race of the perpetrator, the reports should always specify that fact to avoid a perception that race is less frequently reported by the DSS when the offender is Caucasian.

Recommendations from RSHC

- *Consider developing a more detailed policy on the use of race or ethnicity identifiers in DSS Crime Notices, or examine whether such identifiers should be used at all.*

Doing so would ensure consistency in use across all ethnicities and make clear how and when an identifier is used. The Community Safety Advisory Board and the Faculty Research Committee on Public Safety could also weigh in on this topic.

⁸ See *Northwestern University Department of Safety and Security Overview*, p. 11 (November 2020).

SECURITY OPERATIONS ANALYSIS RECOMMENDATIONS

Similar to the community engagement review, the operational reviewers (SRMC) provided additional recommendations stemming from their analysis. Their key findings and high-priority recommendations are summarized below.

Generally, the Department of Safety and Security (DSS) is a well-managed campus public safety and security operation. This includes officers focused on protecting the community, responding to crime, and preserving public order. Officers provide a range of services to the public as evidenced by workload data and incident reports. Oversight and personnel accountability processes are aligned with current departmental regulations. Northwestern campuses in Evanston and Chicago experience a very low crime rate according to published statistical reports.

In recent years, DSS has been impacted by budget and staff reductions still having a duty to protect the campus community. Among the current and emerging challenges are those associated with the COVID-19 pandemic and responding to calls for social justice. Given recent incidents on the Chicago campus, including robberies, there is also an increased desire for safety and security services by those on the Chicago medical campus and hospital facilities. Further, there is a national trend of increased violence against employees in healthcare facilities.

The Department of Safety and Security has taken steps relative to staff preparedness and best practices, including:

- Prioritization of staff development with continued training and preparedness for rare but high-risk incidents (e.g. an active shooter on campus)
- Coordinating with local, state, and federal security operations
- Attaining accreditation and advancing policy and procedure changes to reflect best practices

H. Update the Safety & Security Code of Conduct and Code of Ethics

Security Operations (SRMC) Assessment Results: Update Code of Conduct and Code of Ethics

SRMC evaluated the Safety & Security Code of Conduct and Code of Ethics that all officers and staff are required to abide by. The Code of Conduct serves as the most authoritative set of directives and the basis for holding employees responsible and accountable, in conjunction with university-wide policies. Revisions to update both documents to reflect current concerns may be warranted.

Code of Ethics

The Code of Ethics has not been updated since 2002 and should be refreshed. The language currently includes a commitment to “respect the constitutional rights to liberty, equality, and justice” but should be updated to explicitly include respect to all individuals.

Code of Conduct

The Code of Conduct (updated May 2013) currently forbids association by DSS personnel with anyone with a “bad reputation” or “who are under criminal investigation or indictment, or who

have prior convictions for felonious activity.” The Code of Conduct does not currently prohibit engagement in hate groups or organizations that espouse bias and discrimination. This could leave a gap in the department’s ability to hold officers to the expected standard, and has become a national concern in recent years.

Furthermore, the current policies and procedures do not explicitly assign a supervisor to monitor employees’ social media or online presence for signs of engagement with hate or extremist groups. The Code of Conduct currently designates the Deputy Chief of Police to conduct a criminal history check twice a year to look for official records that could disqualify officers from service. However, because the Code of Conduct sets a higher standard that officers should not even associate with those with a “bad reputation”, monitoring social media modernizes and formalizes a compliance method.

Expectations for officers should take into consideration both their unique role on campus as well as their rights as employees who are due equal treatment under university policies applicable to all faculty and staff. There is no indication that Safety & Security officers currently participate in any hate groups.

Recommendations from SRMC

- *Consider updating the Code of Ethics to specifically include respect for the constitutional rights of everyone.*
- *Consider updating the Code of Conduct to prohibit employees from participating and/or having membership in hate or extremist groups, and then require a compliance method.*

A specific command-level supervisor should be accountable for monitoring social media, at least twice a year, for DSS employee participation and/or membership in hate or extremist groups.

I. Revise the Process for Handling Complaints

Security Operations (SRMC) Assessment Results: Citizen Complaints

While the community engagement review looked at the process for complaints through a transparency and accountability lens, the operations review focused on alignment with legal and accreditation standards as well as properly documenting the eventual agreed-upon process. There is no inherent contradiction or conflict in being able to accomplish the recommendations about complaints issued by either reviewer.

There are multiple channels to initiate a complaint against DSS personnel. These are accessible and well published. These include:

- An anonymous tip line, EthicsPoint, to make personnel conduct complaints. This goes to the university's Compliance office, which then refers the report to the appropriate department for investigation and follow up on the results.
- Students can use the Bias Incident Form. Complaints go to Campus Inclusion and Community in Student Affairs.
- For specific complaints relating to sexual harassment or discrimination, the Office of Equity accepts reports online and by phone. These complaints are investigated by the Equal Opportunity and Access Office under the Office of Equity.

The section on Citizen Complaints in the DSS manual was issued on March 11, 2009 and will likely need revision. Revisions should be aligned with any changes that arise from the accountability and transparency recommendations posed by RSHC in the community engagement review. Potential changes include:

- Updating to meet Commission on Accreditations for Law Enforcement Agencies (CALEA) standards. These include how complaints are investigated, time limits for investigation, notifications to complainant and employee including investigation status, record of complaints, requirement for an annual statistical summary, and procedures on when complaints are made public.
- Requiring complaints be investigated by a supervisor of higher rank than the involved officer, if the matter is handled by DSS.
- Outlining the process by which complaints are referred to a unit outside of DSS or to an authority outside of the university, including how criminal allegations are investigated.
- Updating the methods by which an officer may appeal the findings of a complaint investigation through a grievance process.
- Changes should continue to align with the State of Illinois Uniform Peace Officers' Disciplinary Act, which sets specific timelines for completing a citizen complaint investigation, the scheduling of interviews of involved personnel, and the disposition (i.e. result) and classification system.

The department implemented a more rigorous complaint-tracking process in 2018. DSS now tracks complaints against both contracted security officers as well as its own personnel. The origin of the complaint is identified as from within the department (presumably related to an alleged policy violation) or externally from a community member resulting from a citizen contact or call for service.

Complaints are infrequent compared to the number of calls for service, though it is important to recognize that there may be reasons why people may not report concerns about experiences with DSS, particularly among Black and marginalized communities. In 2019, the last full year of data available, there was one complaint filed for every 3,373 service calls (0.0029%).

Recommendations from SRMC

- *Consider updating the department policy on complaints to reflect current practice and procedures, including any changes made to the process based on this report.*

This should be done in conjunction with any complaint process changes stemming from RSHC's recommendations to remove Safety & Security from the process as detailed in the accountability section of this report. The updates to the department manual could include direction on how complaint investigations are conducted and how complainants are notified, requiring that any investigations that continue to be conducted by DSS are by a supervisor of a higher rank than the officer in question, and explaining the circumstances and process for referring the investigation of a complaint to an outside agency.

- *Consider revising policy to comply with mandatory CALEA standards on complaint types and investigation time limits in preparation for attaining accreditation.*
- *Consider adding guidance and direction to the department manual on how citizen complaint investigations should be conducted, including outcome notification with complainant.*

J. Prioritize Gaining Accreditation

Security Operations (SRMC) Assessment Results: Accreditation

The regular review and update of policies and procedures is lagging in the Department of Safety & Security (DSS). However, Senior Associate Vice President and Chief of Police Bruce Lewis has set a goal for DSS to achieve accreditation by July 2022 from the Commission on Accreditation for Law Enforcement Agencies (CALEA). This is widely recognized as the gold standard in public safety and many necessary updates will occur naturally through the accreditation process.

Importantly, the rigorous process to achieve accreditation will require documented compliance with 189 standards set by CALEA. Some standards will require regular time-sensitive reports, including an analysis of the department's efforts in recruiting a diverse workforce, citizen complaints, use of force, training on lethal and less-lethal weapons, and vehicular pursuits, etc.

One example of how CALEA accreditation will inherently improve operations is with the automatic adoption of the "8 Can't Wait" campaign policies, which are incorporated into CALEA standards. The policies are:

1. Ban chokeholds and strangleholds
2. Require de-escalation
3. Require warning before shooting
4. Require exhausting all alternatives before shooting
5. Duty to intervene
6. Ban shooting at moving vehicles
7. Require use of force continuum
8. Require comprehensive reporting

DSS's current Use of Force policy is already closely aligned with this list. DSS will further refine the policy to ensure compliance and commitment with the 8 Can't Wait recommendations.

Only 47 agencies in Illinois have been awarded CALEA accreditation. The University of Chicago Police Department is the only university/college agency accredited in Illinois. The department purchased a computer software program (PowerDMS) to manage accreditation files and training records. This system has a module available that allows supervisors to track personnel performance and serves as an early warning system.

Recommendations from SRMC

- *Consider prioritizing CALEA accreditation.*

Potential civilian staff positions that would help achieve accreditation are a records manager, a dedicated training coordinator (currently a shared duty), and an assistant to the accreditation manager.

- *Consider giving the highest priority to completing updates to the Use of Force policy.*

The update should be followed by training for all officers and, as applicable, all security officers.

K. Assess Activities to Reassign Away from Safety & Security

Security Operations (SRMC) Assessment Results: Work Analysis

Chief Lewis and senior members of the Department of Safety & Security (DSS) have extensive career experience. Consequently, Chief Lewis is exceptionally qualified and well-connected within the law enforcement profession. Seven positions in the DSS organization report directly to Chief Lewis.

SRMC noted that one of these, the director of emergency management, is currently vacant. This position was created in 2008 to conduct a campus-wide hazard and vulnerability assessment, maintain a comprehensive emergency preparedness plan, and establish university-wide support and response centers.

Deputy Chief Eric Chin also is highly regarded and has a depth of experience in campus policing. In his current position, he oversees the daily work of uniformed patrol operations, investigations, internal policies and procedures, and internal affairs. He also currently facilitates the Behavioral Consultation Team meetings. Three police commanders report directly to the deputy chief. They oversee the Evanston and Chicago campuses and the criminal investigation unit.

Safety & Security's sworn staffing (i.e. officers) has been reduced from a high of 47 people in fiscal year 2019 to currently 38 in fiscal year 2021. Civilian officers (unarmed community service officers and communications dispatch officers) have remained relatively steady over time and currently number 29 staff. Further details are provided in the November 2020 Safety & Security Overview report.

This is consistent with other campus security departments where sworn officer staffing also decreased at some point over the three-year period while student enrollment numbers remained level or increased.

Recommendations from SRMC

- *Consider a detailed strategic workload assessment to determine which activities conducted by Safety & Security should be reassigned to other university functions.*

Evaluating the duties and responsibilities of officers would help determine the appropriate resource mix of campus safety officers with unarmed civilian security staff. There are likely some duties and calls for service that can be performed by unarmed staff that are currently being done by officers.

Staffing levels should be based on a strategic workload assessment, which looks at time expended on citizen- and officer-initiated calls for service. Reassigning staff or using the staffing assessment to determine roles DSS should no longer perform can increase community trust and legitimacy, reduce the use of overtime, and eliminate personnel performing duties normally assigned to other job classifications.

- *Consider a continuity plan for how to maintain operations should top leadership in Safety & Security be unavailable.*

The department is encouraged to plan for continuity of operations in the event of the unforeseen absence or loss of key individual(s), in particular Senior Associate Vice President and Chief of Police Lewis and/or Deputy Chief Chin. Individual lower-level command and supervisory personnel should be provided opportunities for career advancement and job enrichment by identifying projects, programs or functions that can be effectively delegated.

CONCLUSION

This external review's charge was to evaluate the Department of Safety & Security (DSS) through reviewing information and interviewing stakeholders.

The main themes of this analysis are the need to:

1. Rebuild trust through community engagement
2. Redirect resources toward more appropriate responses
3. Increase accountability and transparency in campus security

Riley Safer Holmes & Cancila's community engagement review demonstrated that there is not a single solution or quick fix to the pain and trauma that some stakeholders experience or perceive during interactions with campus safety officers. Like all complex challenges with systemic roots, the solution can only come from a multi-faceted and coordinated approach to systemic change. This requires a commitment to prompt, effective, and measurable progress that takes into account the views and interests of all stakeholders, especially those from Black and marginalized communities.

Security Risk Management Consultants' security operations review demonstrated that DSS currently meets the standards of a professional safety organization. However, the path to change undoubtedly includes engagement with the community as well as by leadership. Findings and recommendations concentrate on process, policies, procedures, and other actions to help make positive change and build support for campus safety functions.

The Northwestern community has a unique opportunity in this moment to come together and create a new vision for what campus safety could look like, building upon the recommendations in this report and other ideas. Emphasizing the lens of students as well as Black and marginalized stakeholders will help build a safer and more welcoming community for all stakeholders.

The consultants recommend the entire Northwestern community take the opportunity to learn and participate in the process to transform their Department of Safety & Security.

APPENDIX: LIST OF RECOMMENDATIONS

The following recommendations are from the external review of the Northwestern University Department of Safety & Security (DSS) published in March 2021. A community engagement review was conducted by Riley Safer Holmes & Cancila (RSHC) while a security operations review was conducted by Security Risk Management Consultants (SRMC).

Please refer to the report for further detail on the findings and recommendations. Some explanatory text for the recommendations are abridged from the main report unless necessary to provide clarification or context.

EXECUTIVE SUMMARY: MAJOR THEMES

The two separate analyses were based on multiple data sources, including over 80 community conversations and focus groups conducted by the two reviewers collectively. These discussions were with students, faculty, staff, university leadership, alumni, and local law enforcement officers. Particular effort was made to seek feedback from Black student groups and with student activists.

Both reviewers received full cooperation from the university and Safety & Security leadership to speak with stakeholders and to access data.

The operational review found that DSS is a well-managed campus public safety and security operation. There are some opportunities to improve or update policies and practices to mitigate security risks. However, both the community engagement and operational review found stakeholders broadly agree there is an urgent need for systemic change in campus safety practices.

1. Rebuild trust through community engagement

Stakeholders broadly perceive Safety & Security's approach has trended over time towards law enforcement rather than community engagement, and this has played a part in some stakeholders' distrust in campus safety personnel.

2. Redirect resources towards more appropriate responses

There is broad stakeholder consensus that at least some functions currently fulfilled by Safety & Security should be conducted by alternative means, especially regarding student mental health responses.

3. Increase accountability and transparency of campus security

A number of stakeholders, particularly Black stakeholders, expressed a lack of trust in Safety & Security stemming from perceptions of being treated differently in interactions with campus safety officers and feeling like Black students lack a voice in shaping DSS practices and policies. There was a desire among some stakeholders for greater transparency into public safety initiatives and practices, and for better communication on what changes were being implemented.

JOINT RECOMMENDATIONS

Although Riley Safer Holmes & Cancila (RSHC) and Security Risk Management Consultants (SRMC) conducted separate reviews with different focuses, the external reviewers found considerable overlap in their findings. Therefore, some recommendations are made jointly with discussion of findings both from the community engagement perspective and from the security operations lens.

A. Reallocate Mental Health Responses and Resources from Safety & Security to Mental Health Experts

“**Redirection of mental health** responses from Safety & Security, and in tandem **additional resources** towards mental health experts, would allow mental health professionals to be the first and potentially only group that interacts with students in health and wellness incidents.”

- *Consider removing DSS as frontline responders even for more serious student mental health and wellness incidents.*

This means that DSS officers may still need to be present on the scene, but mental health professionals typically will be the first group, and potentially the only professionals, who interact with the students depending on the needs and the risk levels.

- *Consider the best resources to replace DSS officers as frontline responders in mental health incidents.*

This could include social workers, psychologists, counselors, paramedics, trained unarmed and plain-clothed community service officers, and trauma specialists.

- *Consider revising current DSS policies on mental health responses and developing an escalation protocol in partnership with Student Affairs.*
- *Consider reassessing the leadership and organizational placement of the Behavioral Consultation Team, including whether a licensed psychologist or civilian should be the facilitator. Public safety officers could continue to provide insight and support as members of the team.*

B. Pivot to a Community Engagement Approach to Campus Safety

“**A pivot towards community engagement** – such as proactive outreach, educational programming, and clear and consistent communication about Safety & Security services – can rebuild trust and legitimacy in current safety personnel, while the university makes a more systematic change to how it handles campus safety.”

- *Consider designating a supervisory-level officer to be solely focused on community engagement.*
- *Consider using a different format for patrol activities to encourage more interaction by the officers with the community.*

- *Consider sending public safety officers and community safety officers (unarmed security personnel) to professional training on community engagement and crime prevention.*
- *Consider a fresh look at the types of crime prevention programs, delivery methods, and opportunities to interact with students, especially in residence halls, to deliver crime prevention messages and resources.*
- *Consider placing public safety officers in small, but visible, spaces within the community to create more opportunities for additional informal engagement.*

C. Update and Revise Safety & Security Mission Statement

“Updates and revisions to the Safety & Security mission statement would acknowledge and articulate the need to change, as well as make clear the department’s intent and plans to do so.”

- *Consider revising the Safety & Security mission statement and supporting material in a way that would speak to concerns raised by stakeholders and the reasons they gave for being unable to trust campus safety personnel.*

D. Improve Unconscious Bias Training

“Improved training for Safety & Security on unconscious bias could help reduce incidents where stakeholders report feeling unfairly treated based on race.”

- *Consider ways to improve unconscious bias training for DSS officers.*

The university should consider ways to improve unconscious bias training in light of stakeholders’ belief that the training has not been sufficiently effective to date.

COMMUNITY ENGAGEMENT ANALYSIS RECOMMENDATIONS

In addition to the recommendations presented jointly by both reviewers, each external reviewer provided further recommendations based on their analysis. Riley Safer Holmes & Cancila’s (RSHC) community engagement recommendations are detailed below.

E. Increasing Accountability to Advance Change and Transparency

“Increased accountability for Safety & Security overall, with a structure in place to coordinate and share information on efforts to change, would help rebuild trust the university leadership and DSS are moving towards for a more effective and equitable public safety function.”

- *Develop a strong university leadership structure to advance Safety & Security change initiatives and community public safety improvements.*

The university should consider the best structure for advancing public safety changes, including:

- What university leadership structure for DSS change initiatives and campus safety initiatives will maximize stakeholder trust;
 - Who is best suited to conduct periodic reviews of DSS's community engagement initiatives and its unconscious bias and related training programs and provide reports on progress to the university's senior leadership;
 - Who should be tasked with investigating reported concerns about public safety officer conduct, conducting ongoing reviews of DSS's policies and procedures to identify any potential disparate impact on marginalized stakeholders, and ensuring there is sufficient transparency about DSS's change initiatives;
 - How will the public safety efforts of the Community Safety Advisory Board, a group focusing on mental health response options, DSS change initiatives, the Faculty Research Committee on Public Safety (see section 2 below), and the university-wide social justice initiative be coordinated; and
 - How will stakeholders' public safety concerns be communicated to leadership and how will updates on public safety improvement efforts be shared with stakeholders.
- *Consider conducting an annual formal audit on the effectiveness of community policing and engagement practices and issue a public report.*
 - *Consider incorporating community engagement metrics into officers' performance reviews.*
 - *Consider removing Safety & Security from the process of reporting, investigating, and disciplining safety personnel misconduct.*
 - *Consider expanding information-sharing resources on campus safety services.*

F. Formation of a Faculty Research Committee on Public Safety

"The **formation of a faculty research committee on public safety** would leverage Northwestern's eminent faculty experts to help inform a new evidence-based campus safety model."

- *Consider forming a Faculty Research Committee on Public Safety.*

G. Develop a policy on the use of racial identifiers in Crime Notices

"A **policy on the use of racial identifiers in campus crime notices**, and potentially eliminating usage altogether, would reduce discretion in including information that could perpetuate bias."

- *Consider developing a more detailed policy on the use of race or ethnicity identifiers in DSS Crime Notices, or examine whether such identifiers should be used at all.*

SECURITY OPERATIONS ANALYSIS RECOMMENDATIONS

Similar to the community engagement review, the operational reviewers (SRMC) provided additional recommendations stemming from their analysis. Their key findings and high-priority recommendations are summarized below.

H. Update the Safety & Security Code of Conduct and Code of Ethics

“Revisions to the Safety & Security Code of Ethics and Code of Conduct to expressly prohibit association with hate or extremist groups, and then to implement a compliance method, would allow for additional accountability on officer character and conduct.”

- *Consider updating the Code of Ethics to specifically include respect for the constitutional rights of everyone.*
- *Consider updating the Code of Conduct to prohibit employees from participating and/or having membership in hate or extremist groups, and then require a compliance method.*

I. Revise the Process for Handling Complaints

“An independent and more transparent complaint reporting process that removes DSS from leading the report intake, investigation, and discipline process for officer misconduct would speak to concerns that complaints are not being addressed. At a minimum, the process as it currently stands should be updated and codified.” *(See also Item E, Increasing Accountability)*

- *Consider updating the department policy on complaints to reflect current practice and procedures, including any changes made to the process based on this report.*
- *Consider revising policy to comply with mandatory CALEA standards on complaint types and investigation time limits in preparation for attaining accreditation.*
- *Consider adding guidance and direction to the department manual on how citizen complaint investigations should be conducted, including outcome notification with complainant.*

J. Prioritize Gaining Accreditation

“Gaining accreditation, and the accompanying regular documentation and reviews by an outside agency, would elevate standards on life, health, and safety procedures.”

- *Consider prioritizing CALEA accreditation.*
- *Consider giving the highest priority to completing updates to the Use of Force policy.*

K. Assess Activities to Reassign Away from Safety & Security

“Completing a **deeper strategic workload assessment** on Safety & Security’s activities would underpin a fully informed decision on which activities should be reassigned to other university functions.”

- *Consider a detailed strategic workload assessment to determine which activities conducted by Safety & Security should be reassigned to other university functions.*
- *Consider a continuity plan for how to maintain operations should top leadership in Safety & Security be unavailable.*