

Public Safety Analytics & Bias-Free Policing Policies Recommendations

About these Recommendations

The Public Safety Advisory Committee (PSAC) developed recommendations on Metro's Public Safety Analytics (PSA) and Bias-Free Policing (BFP) policies. These recommendations respond to [Metro Board Motion #2022-0286](#). This motion directed Metro staff to develop the PSA and BFP policies to "ensure unconscious bias does not influence public safety data analytics as it has in the past" and "reaffirm and declare that racism is a threat to public health and safety that results in large disparities in life outcomes beyond the Metro system for Black people." Metro staff and PSAC members worked together to identify datasets, outcomes for key performance indicators, and outreach methods to inform the drafting of this policy.

Context

PSAC has previously made recommendations related to the use of data for the deployment of public safety resources. Those can be found [here](#). These recommendations articulate several key points that are pertinent to PSAC's position on the development of the PSA and BFP policies and provide a framework for the recommendations in following sections.

- 1) *"Metro should not develop, adopt, or implement any system of predictive policing, or **use crime data and analytics to determine where to deploy law enforcement personnel.**"*
- 2) *"Metro should prioritize the timely adoption of the **robust ecosystem of non-law enforcement alternatives** to community safety developed by PSAC."*
- 3) *"Metro should also use existing **equity-driven platforms** created by community-based organizations—and not police departments or law enforcement associations of any kind—to determine where to allocate non-law enforcement services that truly enhance community safety."*

These three points - the exclusion of crime data usage to deploy law enforcement personnel, the prioritization of the deployment of non-law enforcement public safety alternatives, and the use of existing equity-driven data indexes to determine resource need - are central to the following recommendations.

Datasets

PSAC has reviewed [Metro's proposed data points](#) and recommends the following added datasets and data points as potential layers for the Public Safety Analytics policy.

Note: PSAC has expressly recommended against the use of crime statistics to deploy law enforcement resources. This data, when used to deploy police, will continue to exacerbate the currently disproportionate distribution of citations to Black and Hispanic riders on the Metro system.

1. External Platforms

- a. [Justice Equity Need Index](#)
- b. [Justice Equity Services Index](#)

2. Supporting Unhoused Riders

- a. Data from Metro's homeless outreach teams
- b. Crime incident reports that involve an unhoused individual

3. Operations & Maintenance Data

- a. Vehicle maintenance requests
- b. Facility maintenance requests (track repairs, elevator/escalator repairs, lighting repairs)
 - i. *Real-time requests from transit riders, vehicle operators, and Metro frontline staff should be prioritized if used in an index.*
- c. Station/stop lighting conditions
- d. Station/stop cleanliness conditions
 - i. *Real-time requests from transit riders, vehicle operators, and Metro frontline staff should be prioritized if used in an index.*

4. Internal Security Data

- a. Vehicle operator calls for assistance
- b. Triggered intrusion alarms at Metro facilities
- c. Closed Circuit Television (CCTV) feeds

Outcomes for Key Performance Indicators

PSAC has articulated the following outcomes to support key performance indicators for the policy. Metro should use these proposed outcomes to measure the success of the program.

1. Law Enforcement Responses and Performance

- a. Reduced calls for law enforcement
- b. Reduced overall citations and arrests
- c. Reduced use of force incidents
- d. Increased number of de-escalated incidents
- e. Reduced number of complaints against law enforcement
- f. Reduced reports of law enforcement misconduct
- g. Reduced citations to Black Metro riders (*reduction should be based on overall percentage share of citations by racial group, not just cumulative citations*)
- h. Reduced citations to Hispanic Metro riders (*reduction should be based on overall percentage share of citations by racial group, not just cumulative citations*)

2. **Non-Law Enforcement Responses and Connections**
 - a. Increased deployment for mental health outreach team
 - b. Increased deployment of homeless outreach team
3. **Rider Satisfaction**
 - a. Increased rider satisfaction regarding racial profiling/bias

Outreach

The committee identified the following groups and methods for outreach on the PSA and BFP policies. The *Key Constituencies* section outlines the target populations Metro should engage and identifies specific groups or organizations who can provide input. The *Outreach Methods* identifies the ways that Metro can most effectively reach the communities who will be most affected by these policies.

KEY CONSTITUENCIES

1. **Youth & Seniors**
 - a. Youth Justice Coalition
 - b. Students who ride Metro, especially junior high and high school-age students
 - c. Senior centers and organizations who represent the needs of seniors
2. **Transportation Justice Organizations**
 - a. Bus Riders Union
 - b. Alliance for Community Transit Los Angeles
 - c. People for Mobility Justice
3. **Civil Rights Organizations**
 - a. Members of the LGBTQ Community and associated advocacy organizations
 - i. Organizations include APAIT, Trans Latin@ Coalition, Program for Torture Victims, Bienestar, Connie Norman Empowerment Center, Gender Justice Los Angeles, Invisible Men, In the Meantime Men, APLA, AMAAD
 - b. People with disabilities - physical, intellectual, developmental - and associated advocacy organizations
 - c. Black Lives Matters LA chapter
 - d. American Civil Liberties Union of Southern California
 - e. Community Coalition
 - f. Organizations representing the needs of female identified or feminine of center people
 - g. Organizations representing the needs of the unhoused community
4. **Metro Frontline Staff**
 - a. Vehicle operators
 - b. Janitorial and maintenance staff
 - c. **Transit ambassadors**
5. **Civic Data Organizations**
 - a. Civic tech organizations
 - i. Organizations include Data + Donuts or Electronic Frontier Foundation

OUTREACH METHODS

Prioritize In-Person Engagement: PSAC recommends in-person engagement as the most effective way to gather deeply personal information on public safety and meet Metro riders where they are. Engagement at major rail stations and bus stops will be particularly effective at ensuring Metro riders have the opportunity to provide feedback on these policies. Metro should also consider long-form engagement through individual interviews or focus groups. Additionally, there can be added benefits to incentivize participation in outreach. Providing compensation for participation in outreach activities is essential to value participant's time and bring in more participants. Offering amenities like food and childcare will help meet participant's basic human needs.

Bridging the digital divide: For many of the communities identified in the "Key Constituencies" section, there may be a lack of access to reliable and affordable internet. The committee recommends that Metro take steps to provide the necessary technology and internet access to these communities. As per the committee's *Advisory Recommendations for Metro's Community Engagement on Public Safety Topics*, this can be done by "*providing mobile hotspots in target areas, providing access to technologies like smartphones, laptops, or data plans, hosting technology skills training concurrent with other events, and hosting more in-person events within COVID protocols.*"

Accessibility: Any outreach efforts should be accessible in its language and event scheduling. Written, spoken, and recorded outreach materials should be in plain language and translated/interpreted into as many languages as possible. Engagement opportunities should provide a variety of access methods and adaptable scheduling. This can include offering different meeting access options simultaneously, for instance holding an in-person meeting that is also broadcasted on Zoom and a conference call line. Meeting times should also be offered after working hours or on weekends to offer participation opportunities outside of nine-to-five working hours.

PSAC also recommends that Metro utilizes its existing advisory committees to signal boost the outreach efforts for both the PSA and BFP policies.

Next Steps

At the time of writing, PSAC members made their recommendations based on the information in Motion #2022-0286. The committee has requested further clarification from Metro staff on how these policies will be implemented in the future, what kinds of resources they will deploy, and what the desired outcomes are. PSAC requests to hold further discussions with Metro staff once a draft of the policy is approved internally.

PSAC members will review this draft document at the July 20th General Committee meeting.