



POLICE DEPARTMENT

**COMPLAINTS AGAINST
POLICE PERSONNEL**

**PERSONNEL
PROCEDURE #350**

Responsible Executive:
Chief of Police
Responsible Office:
Vice President for Public Safety
Approved by:
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Policy Statement

It is the policy of the Johns Hopkins Police Department (JHPD) to openly and readily receive all complaints of misconduct reported by a member of the public and by other members of the JHPD through many different mechanisms, to document all complaints, to properly classify allegations, to monitor the status of all complaints, and to fully, fairly, and effectively investigate complaints of misconduct. Where such a complaint is administratively charged, the officer will be held accountable for their actions via a fair, objective, and consistent system that complies with due process. The policies and procedures of this Directive are in conformance with the Maryland Police Accountability Act of 2021, specifically the requirements of the Police Accountability and Discipline Act, MD Code, Public Safety, § 3-101 et seq.

Who Is Governed by This Policy

All sworn police officers, as defined by MD Code, Public Safety, § 3-201, in service with the JHPD are governed by this Directive.

Purpose

The purpose of this Directive is to improve the quality of JHPD services, to promote a high level of public confidence, and to enhance and maintain the professional integrity of the JHPD and its officers. This Directive establishes a formal procedure for the JHPD to receive, document, and investigate all complaints about its members, allowing the JHPD to monitor and enforce standards and communicate that behavior deviating from these adopted standards will not be tolerated.

Definitions

Administrative Charging Committee (ACC):	The ACC is a body of five civilian members, including the chair of the PAB and four other community members, who review the investigations for the complaints filed with the Police Accountability Board (PAB) and decide on disciplinary outcomes.
Administratively Charged:	An officer has been formally accused of misconduct in an administrative proceeding.
Allegation:	Any assertion of wrongdoing against a member of the JHPD.
Civilian Review Board (CRB):	A permanent, statutory agency in Baltimore City that processes, investigates, and evaluates complaints lodged by members of the public against police officers, including sworn JHPD officers, alleging abusive language, false arrest, false imprisonment, harassment, or excessive force. For every complaint falling within its jurisdiction, the CRB must review the investigations of the Public Safety Accountability Unit (PSAU) into complaints within its jurisdiction and may investigate, simultaneously with PSAU, each complaint it deems appropriate.
Complainant:	Any person who makes a complaint of misconduct or makes a service complaint. A complainant need not be the victim of, or a witness to, the allegations of the complaint.
Complaint:	Any allegation of misconduct committed by any JHPD member that is reported by any person, whether a member of the public (external) or a JHPD member (internal).
Complaint Card:	A card containing information, in both English and Spanish, about how to file a misconduct complaint with the JHPD, the CRB, or the PAB in person, via the Johns Hopkins Public Safety (JHPS) website, or by mail, email, or phone.
Complaint Form:	A form that the public and JHPD employees may use to report misconduct by JHPD employees to the JHPD, CRB, or PAB. JHPD members will accept complaint forms at any Johns Hopkins facility or in person at any time.
Complaint Management System (CMS)	An application for entry of complaints against JHPD members, uses of force, vehicle accidents, and pursuits to be reported, and management of investigations related thereto.

Discipline Review Panel (DRP):	A panel consisting of the Vice President for Public Safety, the Vice President and General Counsel (or designee), the Chief Risk Officer (or designee), and a human resources representative. The panel will convene regularly to review investigations for determination of findings and recommendations on discipline.
Emergency Suspension of Police Powers:	Status imposed by the Chief of Police, or their designee, restricting the officer from making arrests, conducting investigations, and otherwise enforcing the laws of the city or state. This shall involve the retrieval of the officer's service weapon, badge, and police credentials and cancellation of approval to carry a secondary weapon (unless the officer has a Maryland concealed carry permit).
Member:	All members of the JHPD, including employees, officers, and volunteers, unless the term is otherwise qualified (e.g., member of the public, member of the Baltimore Police Department, etc.).
Member of the Public:	Any person who is not a member of the JHPD or JHPS. This includes any member of the community, including affiliates and nonaffiliates of Johns Hopkins.
Misconduct:	A pattern, practice, or conduct or failure to act by a sworn JHPD officer that includes but is not limited to (1) depriving persons of rights protected by the constitution or law of the state of Maryland or the United States, (2) a violation of criminal statute, and (3) a violation of JHPD standards, directives, rules, or policies.
Officer:	All sworn police officers, at any rank, as defined by MD Code, Public Safety, § 3-201, in service with the JHPD.
Penalty Days:	The forfeiture of vacation days or the imposition of suspension without pay for a specified period of time. The decision to suspend, deduct vacation days, or impose a combination of both is based upon the severity of the misconduct along with any relevant aggravating and mitigating factors. The Baltimore City ACC and Chief of Police shall define a "day" as a specified number of hours depending on the officer's schedule or unit within the agency.
Police Accountability Board (PAB):	A board that receives complaints, appoints two members of the public to the ACC and trial boards, reviews outcomes of disciplinary matters considered by the local ACC, publishes an annual report, holds quarterly meetings with heads of law enforcement agencies, and otherwise works with the JHPD, other law enforcement agencies, and the Baltimore City government to improve matters of policing.

Preponderance of the Evidence:	To prove that something is more likely so than not so. In other words, a preponderance of the evidence means such evidence that, when considered and compared with the evidence opposed to it, has more convincing force and produces in one's mind a belief that it is more likely true than not true.
Public Safety Accountability Unit (PSAU):	An independent investigative unit of the Office of Hopkins Internal Audits that conducts investigations and assessments of incidents and complaints related to the use of force and misconduct.
Serious Misconduct:	Misconduct that, if administratively charged, may result in penalty days, demotion, or termination, in accordance with the Statewide Police Disciplinary Matrix.
Service Complaint:	A complaint about a police service (e.g., arrival times, applications of JHPD policies) that does not allege member misconduct.
Technical Infraction:	A minor violation by an officer solely related to the enforcement of administrative rules that (1) does not involve an interaction between a member of the public and the officer; (2) does not relate to the officer's investigative, enforcement, training, supervision, or reporting responsibilities; and (3) is not otherwise a matter of public concern.

Policy

Officers of the JHPD shall perform their duties within the boundaries of established contemporary legal and ethical standards. The JHPD establishes and promotes these standards through clear written directives, policies, procedures, rules, and regulations, and through the thorough and impartial investigation of all allegations of misconduct or complaints regarding the directives of the JHPD. This Directive establishes a meaningful and effective procedure for handling complaints to ensure public confidence in the integrity of the JHPD and its officers.

Core Principles

- I. **Trust & Respect:** In order to achieve constitutional, accountable, effective, and respectful policing, there must be trust between the police and those they serve. PSAU serves to ensure that the JHPD's members abide by the spirit and letter of the laws and policies governing their actions. It is paramount that the police treat all persons with respect, fairness, and dignity.
- II. **Member Accountability:** The JHPD openly and readily receives all complaints reported by the public and JHPD members and fully, fairly, and effectively investigates these complaints. Where such a complaint is sustained against any JHPD member, whether sworn or professional, the member will be held accountable for their actions via a fair, objective, and consistent system that complies with due process.

III. Accountability Systems: Through transparent and consistent systems to receive, properly classify, investigate, track and monitor, and adjudicate complaints, the JHPD ensures its operations are functioning effectively. As issues arise that point to deficiencies or problems with these systems, the JHPD will resolve them to ensure its accountability systems are reliable and trustworthy.

Procedures

I. General Complaint Procedures

- A. All complaints, including anonymous complaints, received about JHPD member misconduct—whether sworn officers or nonsworn members—shall be accepted, classified, and investigated. This applies regardless of whether the complaint was submitted verbally or in writing, in person, by phone, or online; whether submitted by a complainant, someone acting on their behalf, or anonymously; and whether the complainant is unable to identify the JHPD member’s name or badge number. (Commission on Accreditation for Law Enforcement Agencies (CALEA) 26.2.1)
- B. Pursuant to MD Code, Public Safety, § 3-103, a complaint of police misconduct filed with a law enforcement agency shall include:
- The name of the police officer accused of misconduct,
 - A description of the facts on which the complaint is based, and
 - Contact information of the complainant or a person filing on behalf of the complainant for investigative follow-up, so members shall try, at minimum, to obtain this information from complainants or a reporter.
- NOTE: A complaint of police misconduct does not have to be notarized and can be in any form, including oral or in writing.
- C. Failure to have all this information does not void the complaint or prohibit the investigation of any complaint. All complaints will be accepted and investigated to the fullest extent possible.
- D. All complaints, whether internal or external, shall be documented by the JHPD in writing and electronically stored. The status of all complaints shall be trackable by the complainant.
- E. Complaints made by a JHPD member will be accepted, classified, and investigated in the same way as a complaint made by the public, unless otherwise provided by law or JHPD policy. Complaints initiated by JHPD members that exclusively concern internal employment matters and do not involve an officer interacting with the public as law enforcement will not be forwarded to the CRB or the ACC. These complaints will still be fully investigated and reported to the public in PSAU’s annual misconduct report.
- F. JHU’s Office of Institutional Equity (OIE) will be immediately notified regarding any reports of sexual misconduct, discrimination, or harassment. OIE is the administrative office responsible for JHU’s noncriminal response to reported

violations of the Sexual Misconduct Policy and Procedures and the Discrimination and Harassment Policy and Procedures.

- Forward to OIE the Incident Report that includes the names of the complainant, respondent, and any witnesses, as well as any other relevant facts, including the date, time, and location of the misconduct.
- Upon request, provide OIE access to investigative notes and findings as necessary for any OIE investigation.
- Document that OIE was notified and how they were notified (e.g., by phone or email), as explained below.

II. Receiving Complaints

- A. All complaints will be courteously accepted by any JHPD member.
- B. All JHPD members must respectfully inform an individual of their right to make a complaint if the individual objects to a member's conduct.
- C. Complaints may be made anonymously. Anonymous complaints will be investigated as fully as any other complaint. (CALEA 26.2.1)
- D. Persons can make complaints of JHPD member misconduct with the JHPD (described below), or they can make complaints of JHPD member misconduct directly with PSAU, the PAB, or the CRB. In addition, complaints of discrimination, harassment, sexual misconduct, or retaliation can be made with OIE. (CALEA 26.1.3)
- E. When a person makes a complaint with the JHPD, the complainant shall receive notification that the JHPD has received their complaint. This notification will be made by email, by letter, or, when no email or physical address is available, by phone. The notification shall include an explanation of the JHPD's investigative process. (CALEA 26.3.4.a)
- F. Officers and supervisors shall activate their body-worn cameras (BWCs) for the full interaction with a complainant. If the complainant does not wish to be recorded, the officer shall record their request to deactivate the BWC prior to deactivating it. See JHPD Directive #433, Body-Worn Cameras.

III. Methods for Making Complaints (CALEA 26.2.4)

- A. The public and members of the JHPD can obtain paper complaint forms from any JHPD member or supervisor as well as from all JHPS buildings across campus and central hubs, to include all campus libraries. There will be public postings at all JHPS buildings providing methods to make complaints.
 - Complaint forms will be provided to any person when they request it from a JHPD member. If the person wants to make their complaint online, via email, or by telephone, the member can provide the person with a complaint card that contains information on the various ways to make a complaint with the JHPD, the CRB, and the PAB. Complaint forms will be available in Spanish and English.

- Anyone can use the complaint form to make a complaint against a JHPD member or use the QR code thereon to make a complaint electronically.
 - Upon completing the complaint form with as much information as the person is able and willing to provide, the person can submit the form through one of the various ways detailed on the form.
- B.** If a person wants to make a complaint via a JHPD supervisor, a person may speak directly with a JHPD supervisor to make a complaint, whether at a JHPD building or at the scene of an incident. Any person may ask any JHPD member to call for a supervisor in order to make a complaint about a JHPD member through a JHPD supervisor.
- C.** Complaints can be made via a website or by email through the following avenues:
- General misconduct:
 - o The JHPD’s website: <https://publicsafety.jhu.edu/communitysafety/jhpd/>,
 - o The PAB’s webpage: <https://civilrights.baltimorecity.gov/intake-form>,
 - o The CRB’s webpage: <https://civilrights.baltimorecity.gov/civilian-review-board/file>, and
 - o Email (psau@jh.edu).
 - Complaints of discrimination or harassment or related retaliation can be submitted to OIE:
 - o Via phone: 410-516-8075,
 - o Via email: ois@jh.edu, or
 - o Via the online form: https://jhu-gme-advocate.symplicity.com/public_report/index.php/pid718388?
 - Complaints of sexual misconduct or related retaliation can be submitted to OIE:
 - o Via phone: 410-516-8075,
 - o Via email: ois@jh.edu, or
 - o Via the online form: https://jhu-gme-advocate.symplicity.com/titleix_report/index.php/pid538037?
- D.** Complaints to the JHPD can be made by phone by calling PSAU at: 667-208-8633.
- E.** Complaints to the JHPD can be mailed via the U.S. Postal Service to this address: Office of Hopkins Internal Auditor, PSAU, 1101 E. 33rd Street, Suite E-220, Baltimore, MD 21218-2696.
- F.** The JHPD also accepts complaints that are made through third-party entities, such as local government agencies or representatives, student groups, nonprofit organizations, and agencies involved in the criminal justice system, among others.

- G. The JHPD also accepts internal complaints made by any JHPD member against another JHPD member. Any JHPD member wishing to make an internal complaint is encouraged to use the complaint form to document the complaint. Members may also report the complaint to their supervisor or directly to PSAU. All internal complaints shall be entered into CMS, in the same way as all other complaints, in order to forward the complaint to the Commander of PSAU.
- H. All discrimination, harassment, sexual misconduct, and retaliation complaints can be made through the above-linked OIE webpages or through: The Johns Hopkins University, Office of Institutional Equity, Wyman Park Building, Suite 515, 3400 North Charles St., Baltimore, MD 21218; telephone: 410-516-8075; TTY: dial 711; email: oie@jhu.edu). (CALEA 26.1.3)
- I. The JHPD may initiate a complaint on its own for incidents that come to its attention anonymously, from the media, social media, JHU administration, or any other source.

IV. Complaint Requirements for JHPD Members

- A. If a person states to a JHPD member that they would like to make a complaint, the member shall:
 - Ask the person if they would like to speak with a supervisor. If the person says yes, call for a supervisor to respond to take the complaint.
 - If the person does not wish to speak with or wait for the supervisor, provide the person with a complaint form or a complaint card that details the many ways the person can make a complaint about a JHPD member (listed above).
 - o NOTE: An officer is not required to delay law enforcement action while awaiting a supervisor, including, where appropriate, issuing a citation or making an arrest.
- B. All complaints shall be accepted and immediately forwarded via CMS to PSAU.
 - The member taking the complaint shall not require that the person provide any specific information, including personal or identifying information, that the person does not wish to provide. However, pursuant to MD Code, Public Safety, § 3-103, members shall attempt to obtain:
 - o The name of the officer accused of misconduct,
 - o A description of the facts on which the complaint is based, and
 - o Contact information of the complainant or person filing on behalf of the complainant for investigative follow-up.
 - Members shall seek to provide any accommodation required for the person to effectively make the complaint—e.g., language interpreter or physical accommodation.
- C. Members receiving complaints shall not discuss the complaints, other than with PSAU or their supervisor, until otherwise instructed.

- D. All officers shall carry the complaint form or complaint card at all times on their person or in their vehicle and shall ensure they are readily accessible.
- E. All officers shall provide their name and badge number in writing, via their business card or otherwise, upon request to any person.
- F. If a person submits to the member a complaint form that is filled out in part or in whole, the member must accept that complaint.
- G. **Members shall not** refuse a complaint; discourage a person from making a complaint; interfere with, obstruct, provide misleading information about, or unnecessarily delay a complaint; or say anything to a complainant about potential criminal charges for filing false complaints.
- H. If any JHPD member observes or becomes aware of any potential act of misconduct by another JHPD member, that member **shall** report the incident to a supervisor or directly to PSAU. Failure to report misconduct is considered misconduct and will result in discipline and appropriate corrective action.
- I. All JHPD members shall immediately notify their supervisor, and provide written notification of the below circumstances on the same day (or within 24 hours, if on time off), if they are:
 - Physically arrested for any violation.
 - Cited for a criminal violation or a minor misdemeanor violation, excluding minor traffic violations.
 - Notified of or receive any operator's license suspension from the Motor Vehicle Administration.
 - Are named as the respondent in a protective or peace order.
- J. Any form of retaliation, interference, intimidation, coercion, or adverse action against any person because they want to make a complaint, they report or attempt to report misconduct, or they cooperate with an investigation is **strictly prohibited**. Retaliatory actions can take many forms, including but not limited to:
 - Threats directed at or harassment of the complainant or their family members, neighbors, or associates, including but not limited to increased surveillance or jeopardizing employment or personal safety,
 - The malicious filing of a criminal or civil action,
 - Any action against a person to dissuade them from making a complaint or cooperating with the investigation, or
 - Decisions affecting an employee's hiring, promotion, or assignment.

V. **JHPD Supervisor Requirements Related to Complaints** (CALEA 26.1.5)

- A. Upon responding to receive a complaint, the supervisor shall:
 - Activate their body worn camera.
 - Allow the person to give an account, uninterrupted, of the complaint.

- Immediately render any medical aid, as required.
 - Identify investigative information and evidence.
- B.** The supervisor will complete preliminary investigative steps. This includes collecting all relevant information and evidence available, and:
- Names and contact information for all complainants and witnesses,
 - Names of JHPD officers and other members on the scene at the time of the alleged misconduct,
 - Any type of physical evidence, such as voluntarily provided video or audio recordings or documentation that such recordings exist, and
 - If the witness chooses not to provide the recording and photographs of apparent injuries or the absence thereof. See JHPD Directive #467, Evidence Collection & Preservation.
- C.** The on-duty PSAU Supervisor or Investigator will be contacted when:
- The alleged misconduct could result in criminal charges, including but not limited to incidents involving assault, driving under the influence or driving while impaired, domestic incidents, or cases where a member is arrested.
 - The misconduct has the potential to result in an adverse community reaction associated with a breach of the peace, property destruction, or assemblies that may impede the flow of traffic.
 - The incident involves a use of force.
 - The incident involves an allegation of bias.
- D.** The supervisor shall supply the person with a complaint form and ask them to complete it with as much information as they are able and willing to provide.
- E.** The supervisor shall review the contents of the form and ask the person about any part that is unclear.
- The supervisor will not require that a person provides any more information than they are willing to provide.
- F.** If the person requires assistance with filling out the form, the supervisor will prepare the form for the person and will note that they did so on the form.
- G.** If the person does not wish to fill out the form, the supervisor will write the complaint information on a form and will note on the form that the person did not wish to complete the form. This can be accomplished electronically through the online complaint form as well.
- H.** The supervisor will contact PSAU to obtain a complaint tracking number and write it on the completed form. Then the supervisor will give the complainant a copy of the complaint form that contains the tracking number.
- I.** If the complaint amounts to a service complaint that does not allege misconduct, the supervisor will attempt to resolve it by explaining to the person relevant JHPD

policies and procedures. Supervisors shall document all such attempts on the complaint form. If successful, supervisors shall document the complaint and forward it to PSAU.

- J.** All complaints received by a supervisor shall be forwarded to PSAU, via their chain of command, prior to the end of their tour of duty. To do so, the supervisor shall enter all complaints into CMS.
- The supervisor must attach the complaint form to the CMS entry.
 - In addition, the supervisor shall attach in CMS any other related materials or evidence that they obtained through their preliminary investigative steps (text messages, photographs, video, etc.).
 - The supervisor shall note in their CMS entry if there are any time-sensitive issues regarding the preservation of evidence that PSAU should be aware of.
 - All complaint forms received by a supervisor shall be forwarded to PSAU.
- K.** When apparent misconduct is reported to a supervisor, even if not done on a complaint form, the supervisor shall immediately document it in CMS to report it to PSAU.
- L.** When a member makes a self-report as described in Section IV.I above, the supervisor shall immediately report this information to PSAU.

VI. Complainants' Rights

- A. Immediate Notification:** Upon assigning any incident with a complainant for investigation, and no later than within one day of receipt of the complaint, PSAU shall contact the complainant to confirm receipt of the complaint and to provide the complainant with the assigned detective's name and contact information.
- Unless the complainant indicated otherwise, the preferred method for contacting the complainant is via email address (if the complainant provided one), with the assigned detective cc'd on the email.
 - If the complainant did not provide an email address, then the complainant shall be contacted by phone. In addition, PSAU shall send a paper letter to the complainant's address. PSAU shall also:
 - o Notify the complainant at every stage of the process, including providing a monthly status update (CALEA 26.3.4.b), and
 - o Provide a case summary to the complainant within 30 days after the final disposition of the case. (CALEA 26.3.4.c)
 - Regardless of the method of complainant notification, PSAU shall document the method of contact in the CMS file (include a copy of any email or physical letter sent, or include notes on any phone call with the complainant).
- B. Representative:** A complainant may have the assistance of a representative in connection with proceedings, including at any interview.

- C. **Education & Explanation:** Pursuant to MD Code, Public Safety, § 3-108, the JHPD Victims' Rights Advocate will provide and explain to the complainant the following:
- The misconduct complaint, investigation, ACC, and trial board processes,
 - Any decision to terminate an investigation,
 - The ACC decision to administratively charge, not administratively charge, unfound, or exonerate a complaint,
 - Trial board decisions, and
 - An opportunity to review a member's statement, if any, prior to concluding the investigation.
- D. **Continuous Updates & Final Summary & Explanation:** Pursuant to MD Code, Public Safety, § 3-108, the JHPD Victims' Rights Advocate will notify the complainant at every stage of the process and provide a case summary to the complainant within 30 days after the final disposition of the case. (CALEA 26.3.4.b)
- E. **Online Access to Complaint Status & Procedural Process:** Pursuant to MD Code, Public Safety, § 3-108, the JHPD will establish an online database where the complainant can enter the case number and follow the case status as it proceeds through investigation, charging, offer of discipline, trial board, ultimate discipline, and appeal.
- F. **Support & Attendance at Hearings:** The complainant may attend any trial board proceedings and the Victims' Rights Advocate will provide support for the complainant, including transportation to and from those proceedings, if needed.
- G. **NOTE:** In the event that OIE is engaged in a concurrent response to a complaint that involves allegations of discrimination, harassment, sexual misconduct, or related retaliation, the rights of the complainant and respondent in the OIE matter are set forth in the Sexual Misconduct Policy and Procedures, available at <https://oie.jhu.edu/policies-and-laws/sexual-misconduct-policy-and-procedures-smpp/>, and the Discrimination and Harassment Policy and Procedures, available at <https://oie.jhu.edu/policies-and-laws/discrimination-and-harassment-policy-and-procedures-dhpp/>, as applicable. For purposes of the Sexual Misconduct Policy and Procedures and the Discrimination and Harassment Policy and Procedures, a complainant is the victim of the alleged conduct, even if it is reported by someone else. A person who reports but has not experienced misconduct is considered a reporter.

VII. **Classification, Assignment & Emergency Suspension**

- A. The PSAU Supervisor will immediately notify the Maryland Attorney General's Office of any police-involved incident that results in death or injuries that are likely to result in the death of a person as soon as it becomes aware of the incident. PSAU will also coordinate and liaise with the Independent Investigations Division of the Maryland Attorney General's Office for all use of

force investigations that they are conducting, in accordance with JHPD Directive #407, Use of Force Reporting, Review & Assessment. (CALEA 26.3.1.b)

- B.** In addition, when the on-duty PSAU Supervisor or Investigator is contacted for any police-involved incident that results in death or injuries that are likely to result in the death of a person, they shall:
- Immediately contact the PSAU Executive Director, the Office of the State's Attorney for Baltimore City, and the Chief of Police to alert them of the incident.
 - Respond to the scene to take over the preliminary investigative steps.
- C.** Upon receipt of any other complaint via CMS, by phone, by email, through the website, via the PAB, via the CRB, or by any other means, PSAU will have the following duties:
- Review the full complaint.
 - For incidents involving serious misconduct, ensure that the Chief of Police is immediately notified.
 - Assess whether, if the complaint were true, the alleged behavior or conduct would constitute a violation of JHPD policy or a legal violation.
 - If the alleged conduct would constitute a violation of JHPD policy or a legal violation, attach all relevant allegations to the complaint based on the information provided. A complaint does not need to specifically name a JHPD policy or legal violation; PSAU shall identify all applicable potential allegations based on the information provided in the complaint.
 - Forward the complaint, along with the identified allegations, to the Chief of Police. (CALEA 26.3.2)
 - Forward all complaints alleging discrimination, harassment, sexual misconduct, or retaliation related to any or all those subjects to OIE for assessment and investigation under their policies and procedures (see OIE's Sexual Misconduct Policy and Procedures, <https://oie.jhu.edu/policies-and-laws/sexual-misconduct-policy-and-procedures-smpp/>, and Discrimination and Harassment Policy and Procedures, <https://oie.jhu.edu/policies-and-laws/discrimination-and-harassment-policy-and-procedures-dhpp/>).
 - Assign serious misconduct cases immediately and all other complaints to an investigator within 24 hours.
- D.** Neither the accused officer's supervisor nor other personnel or commanders at the officer's unit shall investigate police misconduct. All such investigations shall be conducted by PSAU. (CALEA 26.3.1.b)
- E.** In all instances where allegations are a result of a public complaint of misconduct, or use of force, the incident shall be investigated by PSAU. (CALEA 26.3.1.b)
- F.** In some instances, where the allegations are of a minor nature, such as technical infractions, and the allegations do not arise out of a public complaint, PSAU may

send the case back to the accused officer's unit command for them to resolve the matter through nonpunitive corrective action or the expedited resolution process. See JHPD Directive #351, Nonpunitive Corrective Action, and JHPD Directive #352, Expedited Resolution of Minor Violations. (CALEA 26.1.4, 26.3.1.a)

G Discretionary Suspension of Police Powers: Pursuant to MD Code, Public Safety, § 3-107(a), if the Chief of Police or their designee determines, on their own or on the recommendation of PSAU, that it is in the best interest of the public during the investigatory, ACC, and trial board process for the accused officer to be subject to an emergency suspension of their police powers, with or without pay, the Chief of Police may do so. A suspension without pay shall not exceed 30 days. (CALEA 26.3.7)

H. Mandatory Suspension of Police Powers: Pursuant to MD Code, Public Safety, § 3-107(b), the Chief of Police or their designee shall emergency suspend the police powers, with or without pay, of an officer who is charged with the following criminal offenses:

- A disqualifying crime, per MD Code, Public Safety, § 5-101,
- A misdemeanor committed in the performance of duties as a police officer, or
- A misdemeanor involving dishonesty, fraud, theft, or misrepresentation.
- An officer who was suspended without pay under this subsection is entitled to receive back pay if the criminal charge or charges against the police officer result in:
 - o A finding of not guilty,
 - o An acquittal,
 - o A dismissal, or
 - o A nolle prosequi. (CALEA 26.3.7)
- NOTE: MD Code, Public Safety, § 3-107, does not include a limit to the length of time of the mandatory emergency suspension of police powers.

VIII. Immediate Termination for Criminal Conviction

Pursuant to MD Code, Public Safety, § 3-107, the Chief of Police shall terminate the employment of a police officer who is convicted of a felony, without any additional procedures, and may terminate, at their discretion, any officer who receives a probation before judgment for a felony or is convicted of a misdemeanor committed in the performance of duties as a police officer, a misdemeanor second-degree assault, or a misdemeanor involving dishonesty, fraud, theft, or misrepresentation.

IX. Administrative Investigations

A. General Investigation Requirements

For all conduct that is not subject to immediate termination, PSAU, or a third-party entity contracted or assigned by PSAU or another law enforcement agency, will initiate and conduct investigations in accordance with this policy for all investigations of allegations of misconduct or alleged or suspected misconduct or violation of a JHPD policy, directive, procedure, or order by any sworn officer of the JHPD.

- All complaints of discrimination, harassment, sexual misconduct, and related retaliation will be concurrently handled and addressed by OIE and PSAU. OIE's response to such complaints will adhere to JHU's Sexual Misconduct Policy and Procedures, available at <https://oie.jhu.edu/sexual-misconduct/> and the Discrimination and Harassment Policy and Procedures, available at <https://oie.jhu.edu/policies-and-laws/discrimination-and-harassment-policy-and-procedures-dhpp/> (as applicable), while PSAU will investigate in accordance with the process and procedures set forth herein. PSAU and OIE shall coordinate these responses and investigations as appropriate. (CALEA 26.3.1.b)
- In addition to any misconduct investigation, for firearms discharges and uses of force, PSAU shall also follow the procedures of JHPD Directive #407, Use of Force Reporting, Review & Assessment.
- All disciplinary action related to any member of the JHPD who is not a sworn officer, as defined by MD Code, Public Safety, § 3-201, will be handled in accordance with JHU's Human Resource Policies. Members of the JHPD who are not sworn officers are not covered by the Maryland Police Accountability Act.

B. All administrative investigations shall be objective, comprehensive, and timely and shall investigate all allegations of officer misconduct.

C. All investigations will include these important requirements, among others:

- Investigators shall fill out the Conflicts of Interest Form.
- Investigations shall be designed to determine the facts.
- All evidence shall be promptly identified, collected, considered, and stored in the investigative file. This includes, among other possible evidence:
 - o Obtaining and reviewing any photographs taken of injuries or lack of injuries sustained or alleged to have been sustained by all parties,
 - o Ascertaining if any witnesses have video footage of the incident and, if so, reviewing said footage,
 - o Reviewing and archiving video surveillance recordings, and
 - o Obtaining and reviewing all reports related to the incident, including any applicable JHPD Use of Force Reports, supervisory

Use of Force Review Reports, Incident Reports, charging documents (including affidavits of probable cause), and Supplemental Reports.

- All reasonable steps shall be taken to locate and interview all complainants, victims, and witnesses at a time and place that is convenient and accessible to the interviewee. This includes canvassing the areas to attempt to locate any potential witnesses.
 - All reasonable efforts shall be made to identify the accused and involved JHPD members and interview them in a timely fashion.
 - Investigators shall review and evaluate all member activity and evidence of potential misconduct uncovered during the investigation, whether or not it was part of the initial allegations.
 - The member's disciplinary history shall be considered in order to identify patterns in behavior, to include cases that were not sustained.
 - Investigators shall make credibility determinations and make all reasonable efforts to resolve material inconsistencies between member, complainant, and witness statements.
- D.** PSAU shall complete all administrative investigations within 45 days of the initiation of the investigation. Any request for an extension of time must be approved in writing by the PSAU Executive Director. (CALEA 26.3.3)
- E.** PSAU shall coordinate with the CRB for all cases under the CRB's jurisdiction, as required by the public local laws for Baltimore City and pursuant to JHPD Directive #354, Civilian Review Board Complaint Procedures.
- F.** When appropriate, PSAU shall notify JHPD supervisors when a member under their supervision is under investigation.
- G. Requests for Documents, Photos & Recordings** (CALEA 26.3.6.a, b, c)
Investigators shall request that all involved members provide any and all documents, photographs, and audio or visual recordings related to the incident under investigation.
- H. Specific Procedures for Interviews**
- Investigators shall interview the accused member as well as all JHPD personnel, and non-Johns Hopkins employee witnesses willing to give voluntary statements, who were present during the incident.
 - If a non-Johns Hopkins employee witness requests to consult with legal counsel or anyone else prior to giving a statement, that request shall be honored by the investigator.
 - Investigators shall video- and audio-record all interviews when possible, and those recordings shall be made part of the investigative file.

- If video recording is not available for some extenuating reason, the interview shall be audio-recorded and an explanation for the lack of video recording shall be included in the investigative case file.
- A complete record shall be kept of each entire interview, including all recess periods.
- If a witness is willing to provide an interview but does not consent to recording, the investigator shall conduct the interview without recording and document the details in a Supplemental Report.
- If the incident involves potential criminal conduct, the Office of the Vice President and General Counsel of JHU and the Office of the State's Attorney for Baltimore City's Police Misconduct Unit shall be consulted prior to conducting the interview of the accused member.
- Each interview session shall be for a reasonable period and allow for personal necessities and rest periods as reasonably necessary. The officer may request a break during the interview, which shall be reasonably granted.
- During an interview, the investigator shall not ask leading questions, particularly those that suggest a legal justification for the member's conduct.
- Investigators shall not make comments or statements that anyone being interviewed could reasonably understand as intended to discourage them from providing a full account.

I. Lineups, Testing & Polygraphs

- Pursuant to MD Code, Public Safety, § 3-107(d), an investigator may order an officer under investigation to submit to blood alcohol tests; blood, breath, or urine tests for controlled dangerous substances; polygraph examinations; interrogations; or eyewitness identification procedures that specifically relate to the subject matter of the investigation. (CALEA 26.3.6.a.d.f)
- If the officer is ordered to submit to a test, examination, or interrogation, the results of the test, examination, or interrogation are not admissible or discoverable in a criminal proceeding against the officer.
- If an officer is required to submit to a polygraph examination, the results of the polygraph examination are not admissible or discoverable in a criminal or civil proceeding against the officer.
- If an officer is ordered to submit financial statements or documents or to submit to a test, examination, or interrogation, it is considered a lawful order, and if the officer refuses to do so, the JHPD may commence an action for insubordination as a result of the refusal, which may lead to a punitive measure. (CALEA 26.3.6.e)

J. Employee Notification (CALEA 26.3.5)

The investigator should notify an officer that they are the subject of PSAU investigation in writing unless the notice could jeopardize the investigation. In such cases, officers under investigation will not receive notice until immediately prior to their interview or interrogation by PSAU, if one is to be conducted. A copy of the written notification shall be saved in the investigatory file.

- The written notification shall not contain any information that may unnecessarily jeopardize the investigation.
- The notification shall also include notice that, at their own cost, pursuant to MD Code, Public Safety, § 3-109, they may have the assistance of a representative in connection with proceedings, including interviews, interrogations, and testing.

K. JHPD Member & Supervisor Obligations Related to Investigations

- All members shall cooperate with administrative investigations, including appearing for an administrative interview, testing, and polygraphs when requested by a JHPD, PSAU, or OIE investigator and providing all relevant documents and evidence under the employee's custody and control.
- Supervisors shall be notified when a member under their supervision is summoned as part of an investigation and shall facilitate the member's appearance, absent extraordinary circumstances, documented in writing.
- Supervisors will not discuss or otherwise disclose to officers under their supervision that they are subject to an investigation, as such communications should be handled by PSAU.

L. Concluding an Investigation & Preparing the Investigative Report (CALEA 26.3.8)

At the end of each investigation, investigators shall prepare an investigative report that includes the following:

- A narrative description of the incident with a precise description of the evidence justifying or failing to justify the officer's conduct based on facts and circumstances of the incident.
- Documentation of all evidence gathered, including name and contact information for all witnesses, including JHPD member witnesses. If no witnesses were identified, the report shall state this. If the investigator was unable to determine the name or contact information of a witness, they shall state why. They shall also include all information for witnesses who refused to provide a statement.
- Documentation of all JHPD members who were interviewed, and any available transcripts of the interviews.
- The investigator's evaluation of the incident based on the evidence, including their determination of whether the conduct appears to be within policy, regulations, and standards of conduct, including the evidence that directly supports the determination.

- Any credibility findings made, with a precise description of the evidence that supports or detracts from a person’s credibility.
- If material inconsistencies were resolved, a statement of the resolution and a specific description of evidence relied upon to resolve the inconsistencies.
- If a weapon was used, documentation of the officer’s certification and training with that weapon.
- Documentation of recommendations for charges, nonpunitive corrective action, and supplemental or remedial training.
- For each allegation of misconduct, explicit identification and recommendation of one of the following dispositions:
 - o **Unfounded:** Where the investigation determines that the allegations of misconduct are not supported by facts.
 - o **Not Administratively Charged:** Where the investigation cannot determine, by a preponderance of the evidence, that the misconduct occurred.
 - o **Administratively Charged:** Where the investigation determines, by a preponderance of the evidence, that the alleged misconduct did occur.
 - o **Exonerated:** Where the investigation determines, by a preponderance of the evidence, that the alleged conduct did occur but did not violate JHPD policies, procedures, or training.
- For all recommendations of administratively charged, the investigator shall prepare draft charging documents.
- Investigators shall not base disposition recommendations on any of the following reasons:
 - o The complainant seeks to withdraw the complaint or is unavailable, unwilling, or unable to participate. If the complainant is unable or unwilling to provide additional information beyond the initial complaint, the investigator will work to resolve the original allegation where possible based on the available evidence and investigatory procedures.
 - o The complainant pleads or is found guilty of an offense.
 - o The accused officer resigns or retires. In such a case, PSAU will continue to investigate and make a finding, where possible, based on evidence and investigatory procedures available.

X. Disciplinary Process (CALEA 26.1.4, 26.1.5)

- A. In conformance with the Maryland Police Accountability Act of 2021, and as required by MD Code, Public Safety, § 3-105, the JHPD and PSAU have adapted

the Maryland Statewide Police Disciplinary Matrix (Disciplinary Matrix), available at

- B. [https://mdle.net/pdf/Commission Approved Uniform Disciplinary Matrix.pdf](https://mdle.net/pdf/Commission_Approved_Uniform_Disciplinary_Matrix.pdf)), the required framework through which all matters of discipline will be imposed as a result of a sustained (administratively charged) disposition from an administrative investigation into an officer's misconduct.

C. **Disciplinary Charges for Misconduct Involving a Member of the Public**

- Pursuant to MD Code, Public Safety, § 3-104, upon completing a misconduct investigation involving a member of the public and an officer, regardless of whether the complaint originated from an internal or external source, PSAU shall forward the case investigative file, including recommendations and draft charging documents, to the ACC.
- The PSAU Investigator assigned to the investigation shall assist the ACC and provide all information and material requested.
- Prior to forwarding the investigative file to the ACC, the JHPD DRP shall convene to review the investigation recommendations and provide recommended disciplinary findings and approve draft charging documents
- The recommended disciplinary findings and draft charging documents from the DRP shall be forwarded to the ACC.
 - o **NOTE: The ACC is not in any way bound by the DRP's recommendations.**
- Pursuant to MD Code, Public Safety, § 3-104, the ACC reviews each investigation and determines if the accused officer will be administratively charged or not administratively charged. If it determines that the officer should be charged, the ACC will recommend discipline in accordance with the Disciplinary Matrix.
- In addition, under MD Code, Public Safety, § 3-104, the ACC may review BWC footage, authorize that an officer be called to appear before their committee (the officer may be accompanied by a representative, at their own cost), require additional investigations, and issue subpoenas.
- Pursuant to MD Code, Public Safety, § 3-104, when the ACC determines that an officer should be administratively charged, it will issue a written opinion describing in detail its findings, determinations, and recommendations and will forward the written opinion to the Chief of Police, the officer, and the complainant.

D. **Charges for Misconduct Not Involving a Member of the Public**

For all PSAU investigations of misconduct that do not involve a member of the public and an officer, the Executive Director of PSAU will review the investigative report for accuracy and completeness and forward the report to the DRP for it to recommend whether to administratively charge the JHPD officer.

- The DRP shall convene to review the investigative file in its entirety.

- If the DRP decides that the officer should be administratively charged, the DRP shall prepare draft charging documents and recommend appropriate discipline based on the Disciplinary Matrix.
- The DRP will forward its recommendations and draft charging documents to the Chief of Police, who will make the final determination as to whether to administratively charge the officer and discipline them under the Disciplinary Matrix.

E. Offer of Discipline

- In accordance with MD Code, Public Safety, § 3-105, within 15 days after the ACC issues an administrative charge against an officer (or, if not involving a member of the public and an officer, the Chief of Police determines findings and discipline), the Chief of Police shall offer discipline to the officer in accordance with the Disciplinary Matrix.
 - o The Chief of Police may offer the same discipline that was recommended by the ACC or a higher degree of discipline within the applicable range of the Disciplinary Matrix but may not deviate below the discipline recommended by the ACC.
 - o If the officer accepts the Chief of Police’s offer of discipline, that discipline shall be imposed.
 - o If the officer does not accept the Chief of Police’s offer of discipline, then the matter shall be referred to a trial board.

F. Trial Boards (CALEA 26.1.6)

If the officer has not accepted the offer of discipline, the trial board process will be established in accordance with MD Code, Public Safety, § 3-106. The JHPD and PSAU may use the trial board process of another law enforcement agency if there is mutual agreement.

- Pursuant to MD Code, Public Safety, § 3-105, at least 30 days before trial board proceedings begin, the officer shall be:
 - o Provided a copy of the investigatory file,
 - o Notified of the charges against the police officer, and
 - o Notified of the disciplinary action being recommended.
- In accordance with MD Code, Public Safety, § 3-106, the three-member trial board shall be composed the following:
 - o An actively serving or retired administrative law judge or a retired judge of the District Court or a Circuit Court appointed by the Mayor of Baltimore City,
 - o A member of the public who is not a member of the ACC appointed by the PAB, and
 - o An officer of equal rank to the officer who is accused of misconduct appointed by the JHPD Chief of Police. The officer

shall execute a conflict-of-interest disclosure, and if any conflict is identified, the Chief shall appoint another officer.

- In accordance with MD Code, Public Safety, § 3-106, a trial board may administer oaths and issue subpoenas as necessary to complete its work.
- In accordance with MD Code, Public Safety, § 3-106, the JHPD has the burden of proof by a preponderance of the evidence in any proceeding trial board.
- The trial board may hear from witnesses and receive evidence in the case from both the JHPD and the accused officer.
- Proceedings of a trial board shall be open to the public, under MD Code, Public Safety, § 3-106, except to protect:
 - o A victim's identity,
 - o The personal privacy of an individual,
 - o A child witness,
 - o Medical records,
 - o The identity of a confidential source,
 - o An investigative technique or procedure, or
 - o The life or physical safety of an individual.
- In accordance with MD Code, Public Safety, § 3-106, the actively serving or retired administrative law judge or the retired judge shall:
 - o Be the chair of the trial board,
 - o Be responsible for ruling on all motions before the trial board, and
 - o Prepare the written decision of the trial board, including the findings, conclusions, and recommendations of the trial board.
- In accordance with MD Code, Public Safety, § 3-106, a JHPD officer may be disciplined for cause.
- Within 45 days after the final hearing by a trial board, pursuant to MD Code, Public Safety, § 3-106, the trial board shall issue a written decision reflecting the findings, conclusions, and recommendations of a majority of the trial board.
- Within 30 days after the date of issuance of a trial board decision, the officer may appeal the decision to the Circuit Court of Baltimore City. A trial board decision is final unless appealed by an officer. (CALEA 26.1.6)

XI. Antiretaliation

- A. Pursuant to MD Code, Public Safety, § 3-110, an officer may not be discharged, disciplined, or demoted; denied promotion, transfer, or reassignment; or otherwise discriminated against or threatened in regard to the police officer's employment because the police officer disclosed information that evidences:

- Mismanagement,
 - A waste of government resources,
 - A danger to public health or safety, or
 - A violation of law or policy committed by another police officer, or
 - If the officer lawfully exercised constitutional rights.
- B.** In addition, an officer may not be denied the right to bring suit arising out of the police officer's official duties.
- C.** Any disclosure of additional misconduct by any officer or witness being interviewed or interrogated, which was not previously known to PSAU, shall be documented as a complaint in CMS and classified and investigated in accordance with this Directive.
- D.** Nothing in this provision prevents or inhibits the investigation and discipline of any officer for any misconduct.

XII. Executive Director of the Public Safety Accountability Unit

(CALEA 26.2.3)

- A.** The PSAU Executive Director is responsible for ensuring that the complaint, investigation, and disciplinary process is fair, transparent (within the limitations of the statute), timely, and effective, and they have the authority to directly report any and all information directly to the Chief of Police and the Vice President for Public Safety for JHU. The PSAU Executive Director is ultimately responsible for all operations conducted by PSAU.
- B.** The PSAU Executive Director shall ensure that upon receipt of a complaint:
- The complaint is reviewed, assigned a case number, properly classified, and assigned to an appropriate investigator,
 - Complaints are not assigned to an investigator where there exists a conflict or potential conflict of interest,
 - The Chief of Police is notified immediately of allegations of misconduct involving members of the public and a JHPD officer,
 - OIE is notified of complaints related to discrimination, harassment, sexual misconduct, or related retaliation, and PSAU and OIE coordinate to address such complaints concurrently under their respective processes, and
 - Regular supervisory review and guidance is provided to PSAU investigators on their cases by PSAU supervisors.
- C.** Upon completion of the investigation, the PSAU Executive Director shall review the investigative report for accuracy and completeness and ensure that the findings are supported by the appropriate standard of proof. In addition, the PSAU Executive Director shall:

- Order additional investigation where it appears that there is additional relevant evidence that may bolster the investigation. If additional investigation is ordered, the PSAU Executive Director shall ensure it is documented in writing.
- Upon approving the investigation, forward it to the relevant committee (either the DRP or the ACC).
- If the case is charged, ensure that the procedures, as promulgated by the Police Accountability Act and this Directive, are adhered to promptly.
- Provide written notification to both the officer under investigation and any complainants of the final disposition of all allegations, including those that may be closed as “exonerated” or “unfounded.”
- Retain all complaint forms, records, and completed case files for all internal investigations.
- Maintain a system capable of tracking the progress of PSAU investigations to ensure they are conducted in a timely and efficient manner.
- Ensure that completed misconduct investigations are evaluated for policy, training, and tactical or equipment concerns.
- Ensure any recommendations for addressing those concerns are documented and forwarded to the appropriate unit within the JHPD.

XIII. Training

- A. The Public Safety Training Section shall ensure that all supervisors receive in-service training annually on their obligations when called to the scene to accept a complaint about a JHPD member’s conduct.
- B. The Public Safety Training Section shall ensure that all members receive annual in-service training on their obligations when a member of the public states that they wish to make a complaint.
- C. The Public Safety Training Section shall set up any supplemental or remedial training required as a corrective measure resulting from a misconduct investigation. The Public Safety Training Section shall properly document when the public safety personnel involved participated in and completed the required training.
- D. PSAU, with the Public Safety Training Section, will provide regular training to PSAU investigators to ensure they maintain knowledge of and proficiency in conducting an internal administrative investigation of JHPD officers.

XIV. Record Retention (CALEA 26.2.2)

In accordance with MD Code, Public Safety, § 3-112, all records relating to an administrative or criminal investigation of misconduct by an officer, including administrative investigatory records, hearing records, and records relating to a

disciplinary decision, must be permanently retained in a secure area by PSAU and may not be expunged or destroyed by PSAU.

XV. Annual Report (CALEA 26.2.5)

- A.** As part of the JHPD’s annual fiscal year report, required by MD Code, Education, § 24-1208, made publicly available on or before October 1 each year, the JHPD shall include the following discipline-related information for the previous fiscal year:
- The number, type, and disposition of complaints filed against any and all JHPD police officers,
 - The number and type of individuals who filed complaints, including whether the individual who filed the complaint was a student, a faculty member, a staff member, or an individual unaffiliated with Johns Hopkins,
 - A description of the complaint review processes the JHPD uses to review a complaint filed against a JHPD officer,
 - The number of officers disciplined, including the type of discipline administered, and the number of JHPD officer-involved shootings, line-of-duty deaths, and in-custody deaths.
- B.** The information required under subsection A of this section shall be:
- Disaggregated by race, ethnicity, gender, age, and, when applicable, officer rank, and
 - Reported in a manner, consistent with federal law, that protects the confidentiality of the individual who filed the complaint to the extent possible.
- C.** The JHPD shall report the information specified in subsection A of this section to:
- The Mayor of Baltimore City,
 - The Baltimore City Council,
 - The Accountability Board, and
 - The General Assembly.

Policy Enforcement

Enforcement	JHPD managers and supervisors are responsible for enforcing this Directive.
Reporting Violations	Suspected violations of this Directive should be reported to PSAU.

Related Resources

<p>University Policies and Documents</p> <p>Personnel Procedure #351, Nonpunitive Corrective Action Personnel Procedure #352, Expedited Resolution of Minor Violations Personnel Procedure #354, Civilian Review Board Complaint Procedures Operational Procedure #407, Use of Force Reporting, Review & Assessment Operational Procedure #433, Body-Worn Cameras Operational Procedure #467, Evidence Collection & Preservation</p> <p>Johns Hopkins University Discrimination and Harassment Policy and Procedures, https://oie.jhu.edu/policies-and-laws/discrimination-and-harassment-policy-and-procedures-dhpp/</p> <p>Johns Hopkins University Sexual Misconduct Policy and Procedures, https://oie.jhu.edu/sexual-misconduct/</p>
<p>External Documentation</p> <p>Maryland Police Accountability Act of 2021, https://mgaleg.maryland.gov/mgaweb/Legislation/Details/hb0670/?ys=2021rs</p> <p>Maryland Statewide Police Disciplinary Matrix, https://mdle.net/pdf/Commission_Approved_Uniform_Disciplinary_Matrix.pdf</p>
<p>Police Department Forms and Systems</p> <p>https://powerdms.com/ui/login</p>

Contacts

Subject Matter	Office Name	Telephone Number	Email/Web Address
Complaints Against Police Personnel	Public Safety Accountability Unit	667-208-8633	psau@jh.edu