

Compliance and Ethics in Law Enforcement

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Abstract

The law enforcement profession operates in a high risk/high liability arena daily. The essential duties of policing necessitate officers to interact with potentially dangerous individuals, engage in risky situations, and enter hazardous areas; contrary to the majority of other occupations. As police officers navigate their daily duties while handling calls for service within their respective communities, law enforcement agencies need to be proactive and progressive to ensure all statutory and legal requirements are met, including adherence to their internal policies and procedures. Establishing an internal Compliance and Ethics program within law enforcement will provide the department an independent and objective assurance that their employees are compliant with the law, policies, and procedures while conducting business in an ethical manner. The Compliance and Ethics program is designed to add value and improve the agency's operations. The mission of the Compliance and Ethics program is to enhance and protect the organizational values by providing risk-based and objective assurance, advice, and insight. The Compliance and Ethics activities help the Department accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of governance, risk management, and control process. Integration of Compliance and Ethics program will provide an additional level of accountability and transparency, which will increase public trust in law enforcement while protecting the Department and its employees. This paper will provide two examples of high risk/high liability areas within law enforcement necessitating compliance oversight: Evidence and Use-of-Force incidents.

Compliance and Ethics in Law Enforcement

Law enforcement is one of the most noble professions in the nation, yet has recently become demonized (Catenacci, 2021). Police officers typically don't stumble upon a career in law enforcement; rather, they respond to a calling. Policing is one of the only occupations that requires the employee/officer swear upon an oath prior to taking the position. The oath specifically states the officer is willing to risk his or her life while upholding the law, maintaining stability, and ensuring peace. Given the nature of the job, there is always uncertainty when officers respond to calls of service; with the possibility of using physical or deadly force. Nonetheless, police officers continue to enter the profession with undeniable courage. "I believe most officers join the police with the desire to help their communities and get the bad guys" (Leviton, 2019, para. 16). Notwithstanding the numerous levels of supervisor/managerial oversight, law enforcement is not immune from employee misconduct and internal compliance failures, that often results in litigation. To ensure a law enforcement agency is compliant with the plethora of legal requirements and employees are adhering to the internal policies and procedures, integrating a Compliance and Ethics program will assist in providing an additional level of accountability, increase transparency, and promote enhanced public trust within their respective communities. Additionally, the Compliance and Ethics program will protect the police department and its employees by reducing liability, encourage an ethical culture, and improve departmental efficiency.

Transformation of Policing

Law enforcement has struggled to maintain public support over the past several years, following numerous use-of-force incidents that occurred across this nation; eroding law

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enforcement legitimacy (Deuchar, Fallik, & Crichlow, 2018). Given the advent of smart phones, affordable and easily accessible technology has become commonplace. Smart phone technology is comprised of video recording, including live-streaming capabilities, and digital cameras; which are commonly used to capture police interactions with the public. This coupled with a consistent barrage of negative traditional news coverage and adverse social media postings, have instigated public scrutiny, protests, and riotous behavior in such frequency that it appears to be the norm. Thus, policing has also changed. Many law enforcement agencies have armed their police officers with body-worn cameras, in-car cameras, global positioning systems, facial recognition technology, etc., to increase public trust, minimize liability, improve police legitimacy, and enhance officer safety (Primicerio, 2017). Historically, police officers have enforced the status quo, which treated some citizens and societal groups unfairly; a status quo that is no longer acceptable nor tolerated by the public (Comey, 2015).

Law enforcement agencies are consistently required to investigate numerous incidents involving their personnel. Many of these internal investigations are publicly revealed via media outlets portraying a host of cyclical and systemic problems within the policing profession. As a result of the barrage of negative public and media attention, there is a need to abate the reoccurrence of similar incidents. Dissecting many of these incidents may reveal a possible tainted culture within law enforcement. The events illuminate the appearance police officers condone illicit action, events and/or activities, thus, further perpetuate an ethical collapse. There is a definitive need to explore possible solutions to assist law enforcement in minimizing further incidents of misconduct, reduce risk and liability, ensure compliance of law, policies and procedures, improve departmental efficiency, and reacclimate an acceptable ethical culture. Emotional Intelligence and moral compass are areas that should be addressed to help officers

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throughout an agency to better understand self-awareness. Dissemination and comprehension of this information to employees may help in reduce, minimize, and/or eliminate issues that arise in a police department.

While there is no standardized compliance model developed specifically designed for law enforcement, the Society of Corporate Compliance and Ethics (SCCE), promotes ethical practices & compliance standards and resources for a compliance officer that are relevant for law enforcement. As with most organizations, written departmental policies and procedures are extensive and perpetual. While important, policies are only relevant when they are adhered to. In a recent Forbes article Carol Tate (2019), related the following:

Rules matter, but culture and ethics matter more. Companies may have written, accessible policies, processes and tools all of which their employees are trained on. However, if the company has a poor culture, none of its controls, policies or procedures will matter. Instead, in companies with poor cultures, employees tend to act in ways that harm the company's reputation, increase the risk of compliance failures and act in ways that can lead to illegal and/or fraudulent conduct. (Weinstein, 2019, "Does One Field Hold Us to a Higher Standard" section, para. 2)

Recently, there have been numerous police use-of-force incidents captured on video across the nation which have incited civilian protests and riotous behavior. It appears some of the problems within law enforcement may be systemic and portrays that many of the issues are potentially linked to internal cultural and ethical predicaments (Miller, 2019). Recently in Minneapolis, Minnesota, an African American man was killed after a police officer knelt on his neck with his knee for nearly nine minutes. The assisting officers on-scene failed to intervene,

after numerous onlookers actively questioned the incident. Protests against police brutality ignited across the country within days, further eroding the relationship and trust between law enforcement and the public. Internal transparency can be improved as compliance officers convey objectives, findings, and best practices, through frequent training opportunities and informal interactions.

According to Hutson (2019), “In different ways and with different structures, we all seek to work on the parts of police culture that are toxic or unethical and work towards compliance with the law and rules that fit our communities’ ethical standards” (para. 4). Thus, when it is uncovered that a police officer violated a law and/or a departmental policy, not only is the reputation of the alleged police department jeopardized, but rather the entire law enforcement profession. A Compliance and Ethics program provides assurance employees are compliant with both the law and internal policies and reviews existing protocols for relevancy.

Encouraging an Ethical Culture through Compliance

A law enforcement agency will gradually encourage an ethical culture after integrating a Compliance and Ethics program. It is imperative a law enforcement agency head is supportive and uses the Compliance and Ethics program as a conduit to empower every employee to be a change agent. When employees are aware a compliance officer is active within their agency, they are more likely to adhere to departmental policies, rules and regulations. To ensure long-term sustainability and succession planning, a compliance officer(s) should informally interact with personnel and be present throughout the police department on a regular basis. During their communication, the compliance officer should obtain the employee’s input for positive change in an authentic and collaborative manner. The Compliance and Ethics program is a catalyst for empowering every employee to become more self-aware and vigilant. The ultimate goal is to

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ensure departmental employees are doing the right thing when nobody is watching (integrity), while improving the culture of the agency and instilling the virtues of a MAGNUS officer.

Former FBI Assistant Director Patrick Kelley related when agencies are attempting to determine the root cause of a systemic failure, they may want to either retrain the employee(s) or make changes to policy; rather than solely placing blame on the individual (Turteltaub, 2016).

Training

Compliance and Ethics programs are designed to proactively detect and prevent violation of law, departmental policies, and/or procedures before they become a significant issue(s). The day-to-day requirements for law enforcement agencies to progressively ensure the processes and procedures are adhered has expanded tremendously. A Compliance and Ethics program will ensure protocol(s) are established to provide employees with continuing and relevant training on inherited risks and the appropriate response; thus, progressing the law enforcement agency in preparation for the future. Integrating Compliance and Ethics training to cadets in the Academy would afford an opportunity to positively impact the next generation of police officers.

Additionally, similar and targeted training should be delivered to all sworn personnel and professional staff. According to Crowne (2019), “Employees should sign agreement forms that they will follow company policies. Even though proper ethics should be learned at home, it helps to spell out policies so that workers understand they have specific behavioral responsibilities in the workplace” (Ethics and Training Program section, para. 1).

Recruitment and Hiring

As law enforcement continues to struggle in the public trust arena, recruitment of qualified personnel is problematic. Per Roufa, it is becoming more difficult for police departments to find candidates who meet the minimum qualifications to enter a career in law

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enforcement. Aside from a continuing diminished interest in being a police officer, candidates may be disqualified during the background investigation for various actions/behaviors, including drug usage, arrest history, driving records, lack of physical fitness, and/or credit issues (Roufa, 2018). As society continues to become more lenient in various aspects that were previously considered taboo, it is crucial law enforcement remains firm in the recruit of good candidates and background investigations. Recruitment and hiring practices should be reviewed by the Compliance and Ethics staff to ensure consistency and objectivity.

Stakeholders

Actively responding to issues and proactively addressing internal departmental matters can minimize liability and retain future funding. Communicating the implementation of an internal Compliance and Ethics program to elected officials and community members, can safeguard the funding an agency's budget and allocation of the necessary resources, staffing, training, overtime, etc.

Risk Assessments

Law enforcement operates in numerous high risk/liability areas daily where internal and external risk factors vary often. To maintain relevancy, ongoing and recurring risk assessments are required to determine the components necessitating an urgent response and prioritization. According to Crown (2019), "Part of risk assessment should be devoted to identifying and monitoring high-risk concerns for the organization. These risks can involve everything from embezzlement to mistreatment of co-workers" (Risk Assessment section, para. 3). An ongoing risk assessment to identify potential fraud, waste, or abuse should involve communication and information gathering from various ranks and classifications within the entire organization.

Ideally, an accurate risk assessment would entail receiving information from the command staff, managerial employees, and supervisors.

Best Practices

A compliance officer should identify best practices throughout the Department to recognize when an employee has done their job well. Innovation, streamlined protocols, progressive concepts, etc. should be documented and shared throughout the agency. Regardless of a police department's size, the identification and dissemination of best practices, both internally and externally, may allow an agency to flourish. Information sharing is crucial to ensure long-term success. Electronic communication via email, Intranet sites, communication networks, newsletters, webinars, in-person training forums, and/or informal communication are opportune methods to disseminate best practices. If adopted as a best practice, the implementation should be memorialized into a policy and/or documented as a recommended procedure for others to utilize.

Federal Sentencing Guidelines

The United States Sentencing Commission (USSC) has provided Federal Sentencing Guidelines on how entities should establish, maintain, and oversee an effective Compliance and Ethics program. According to Lambarki (n.d.), the Guidelines layout "a model which has become the backbone of every corporate ethics program" (Guideline Compliance Steps section, para. 1). The Federal Sentencing Guidelines traverse both the public and private sector yet have not been adopted by the law enforcement community. Lambarki (n.d., Guideline Compliance Steps section, para. 2) indicated, the compliance steps outlined in the Federal Sentencing Guidelines, §8, include the following:

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- Establish standards and procedures to prevent and detect criminal conduct, which starts with a code of ethics or statement of values.
- Senior management must be knowledgeable about the compliance and ethics program as well as oversee its implementation and make reasonable efforts to ensure its effectiveness.
- Make reasonable efforts to exclude any individual who has committed an illegal act or engaged in other activities inconsistent with a compliance and ethics program from substantial authority in the organization.
- Periodically communicate the aspects of the compliance and ethics program to its members by conducting training programs and disseminating relevant information.
- Ensure that the program is followed by (1) monitoring and auditing activities to detect criminal conduct, (2) periodically evaluating its effectiveness, and (3) employing systems that allow for anonymity or confidentiality if employees want to report criminal conduct without fear of retaliation.
- Promote and enforce the program by offering incentives for performance in accordance with the program and instituting disciplinary measures for engaging in or failing to take reasonable steps to prevent/detect criminal conduct.
- Respond to criminal conduct and take steps to prevent future and similar offenses when criminal conduct has been detected.

The USSC's Federal Sentencing Guidelines offer recommendations that are not only relevant to law enforcement, but absent in a profession longing them.

Implementation

Integration of a Compliance and Ethics program undoubtedly requires the approval, support, and willingness of the agency's leadership to be actively involved in the program. To ensure employee buy-in and minimize potential conflict, the program should be openly discussed, in a transparent approach, to encourage dialogue.

Code of Conduct

To ensure all employees within a police department receive and understand the basic requirements of their employment, the Compliance and Ethics program staff will create and/or enhance the agency's Code of Conduct. A consolidated employee handbook comprised of a simplistic description of essential policies, may be a viable option for law enforcement. The Code of Conduct/employee handbook should be provided to new and current employees, as an electronic or hardcopy option and reviewed on an annual basis.

Internal Reporting

While police departments attempt to employ personnel with the utmost integrity, there will undoubtedly be employees who are involved in misconduct and stray from the departmental guidelines. Thus, a crucial component of the Compliance and Ethics program is the need for police departments to implement an internal reporting option. The internal reporting element is documented in the Federal Sentencing Guidelines and states, "establish and publicize a (whistleblower hotline) system, which may include mechanisms that allow for anonymity or confidentiality, whereby the organization's employees and agents may report or seek guidance regarding potential or actual issues without fear of retaliation" (Read, 2018, para. 8).

In the development and construction of an internal reporting component, police departments should create an opportunity for employees to send information via telephone or

electronical mail (email) regarding possible misconduct, fraud, waste, or abuse. The email should be sent via a domain on a protected website that affords the option for the employee to remain anonymous. The submitting employee should be informed that if they decide to disclose their identity, the receiving Compliance and Ethics officer will not reveal his/her identity to anyone without their permission. The only exception would be to the appropriate law enforcement personnel conducting a criminal investigation.

High Risk/Liability Examples

Two controversial and scrutinized topics within law enforcement, with a high probability for litigation, are Use of Force and Evidence handling. These two prominent issues are often litigated for mistakes, policy violations, public perception, and lack of compliance.

Use of Force

It is important to recognize that peace officers have the authority to use force during the certain situations. Encounters between law enforcement officers and members of the public can potentially result in a use of force incident resulting in the possibility of injury to the civilian(s) and/or officers. According to Primicerio (2018), “Recently, following officer collaboration and communication has diminished between officers and the community following officer-involved fatal encounters with subjects, collaboration, communication, and trust have diminished between both parties” (p. 52). As a result of several high-profile cases, such as deadly officer-involved shootings, new reforms on police use of force have been implemented. Although the U.S. Constitution and the laws of the State of California allows peace officers to use objectively reasonable force to effect an arrest, to prevent escape and/or to overcome resistance, the force must be guided based on ethical decision making.

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As a result of several high-profile cases, the State of California took a very vigorous approach by passing Assembly Bill 392 (AB-392) Peace officers: deadly force and Senate Bill 230 (SB-230) law enforcement use of deadly force training, thereby implementing the strictest use of force policy in the United States. SB-230 requires law enforcement agencies to make an annual report to the Department of Justice regarding the use of force by a peace officer.

Unfortunately, data collection for use of force incidents is voluntary. According the Federal Bureau of Investigations - Law Enforcement Data Collections (2020), only 5,030 out of 18,514 federal, state, local, and tribal law enforcement agencies in America provided statistical data of use-of-force incidents by a peace officer (para. 3). This data reporting is a critical component to ensuring transparency and compliance.

It is crucial for organizational leaders to evaluate, monitor and identify situations to ensure accountability and compliance on use-of-force practices and reporting. It is critical for this process to begin even before a force incident occurs. Police agencies should conduct proactive compliance inspections and audits. This is necessary as the community expects peace officers to exercise their authority and only use force that is reasonable, and only after other avenues have been explored and exhausted. Organizational leaders have a duty to make an honest evaluation of current protocols, training practices, policies and procedures governing the operations of police departments, especially those revolving around the use of force. Compliance and ethical adherence to these new use of force reforms is a matter of critical concern for stakeholders and law enforcement organizations in our nation.

In doing so, organizational leaders need to proactively review internal practices and constantly monitor and evaluate current departmental policies. This process begins by ensuring accountability on force practices at all levels of the organization. Personal and organizational

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understanding is necessary to ensure police personnel comply and apply force based on ethical values. Unfortunately, there is a perception of lack of police accountability when an officer uses force. Any use of force incident, even when the force was lawful and reasonable, is a matter of great public scrutiny, and an excessive use of force incident will diminish police legitimacy and erode public trust if done unethically. Recognizing a definite need for change is essential, as many law enforcement agencies have recently attempted to increase public trust and improve departmental transparency (Primicerio, 2018). Internal compliance inspections generate police transparency, which in turn translates into enhanced public trust, and liability and risk management. One form of ensuring internal accountability is by integrating a compliance use of force review board, consisting of departmental sworn personnel and professional staff, dependent upon the agency size. The review board will proactively examine all relevant use of force training records, force policies, and review administrative use of force reports. The review board can offer outside perspectives for best practices. In order to ensure a more comprehensive assessment of accountability, the compliance review board will be tasked with preparing a biannual comprehensive report on all use of force incidents. As organizational leaders, it is imperative to identify and assess any possible human factors, such as stress or fatigue, that could have led to the use of force incidents.

This will serve as platform for early intervention tool for leadership oversight and organizational accountability. The report will be forwarded through the appropriate chain-of-command to the department head to ensure compliance and accountability at all levels.

Evidence

Use of force is just one example and the most publicized arena that has oversight on multiple levels. Another area in law enforcement that is violated, whether intentionally or by

accident is the collection and processing of evidence. Arguably, one of the most publicized criminal cases in history was the OJ Simpson trial. During this trial, it became very apparent that the handling, or lack thereof, of evidence was extremely flawed. Based on documentation from Crime Museum, LLC (2018), “The detectives who took over Furhman’s shift apparently were never aware of the print and eventually lost it or destroyed without ever being collected. Other items of evidence were also never logged or entered into the chain of custody, which gave the impression that sloppy forensic collection had been carried out at the scene” (p. 1).

Evidence in a criminal investigation can either confirm a guilty verdict or if not handled properly, may cause the acquittal of a suspect. In addition to handling evidence, officers are tasked with handling certain property that do not have any evidentiary value but still need to be placed into evidence had stored for in the department’s care for safe keeping, such as cash, license plates, or even bicycles. Having an oversight, in this area, will help not only in the court process but also, will ensure evidence has been accurately and properly documented.

Most police and sheriff’s departments have a property/evidence technician. Their job is to store evidence, process narcotics, and even handle large amounts of money, should a seizure occur. This puts a lot of responsibility on just one person, who oversees, this area. With that being said, conducting an audit of all of the property is necessary, to make sure all policies and procedures are being adhered to. The Colton Police Department uses Lexipol as its policy and procedure manual. In research from Lexipol (2021), section 801.8 states:

- (a) On a monthly basis, the supervisor of the evidence custodian shall make an inspection of the evidence storage facilities and practices to ensure adherence to appropriate policies and procedures.

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- (b) Unannounced inspections of evidence storage areas shall be conducted annually as directed by the Chief of Police.
- (c) An annual audit of evidence held by the [Department/Office] shall be conducted by a Division Commander (as appointed by the Chief of Police) not routinely or directly connected with evidence control.
- (d) Whenever a change is made in personnel who may have access to the evidence room, an inventory of all evidence/property shall be made by an individual not associated to the property room or function to ensure that records are correct, and all evidence property is accounted for.

With this being said, section (c) is incomplete. Currently, the policy only states a “Division Commander” shall conduct an annual audit of the evidence/property. To ensure the best practice and to show complete transparency to the general public, creating a new position within the department will help in this area. The position should be of the rank of Sergeant or higher and have complete oversight over the civilian evidence technician.

The Sergeant would oversee and perform weekly, monthly and annual audits of random cases entered into the CAD database to ensure anything placed into evidence, criminal or not, was properly tagged per department policy and properly secured. For example, various fluids such as blood or saliva would be placed into a temperature-controlled environment as opposed to a found bicycle that can be placed into a room and stored as space permits. Also, the Sergeant would be in charge of the making sure evidence be properly disposed of, ensuring the statute of limitations on certain items has passed and the department can get dispose of the items. With the combined effort of the Division Commander, Sergeant, and Evidence Technician, an inspection checklist should be created that would help with the audit. Included in the inspection checklist,

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would be who performed the audit, the date it was performed, where it was performed, and then various questions based on the type of evidence that was audited. This type of checklist would help streamline the process and would help catch any discrepancies or may explain why certain pieces of evidence were tagged a certain way.

Following a review of the California Highway Patrol Evidence Property Management, an Evidence room audit may consist of at least 10 percent of the items, with a minimum of ten items, from the evidence/property system shall be inspected. If discrepancies are revealed, an additional 10 percent of the items, or at least ten additional items, shall be inspected so that a total of 20 percent, or a minimum of 20 items, are inspected (California Highway Patrol Manual). A discrepancy indicates the integrity of the command's evidence processing is deficient and further evaluation is necessary. If it is determined, through the sampling of evidence items, that discrepancies exist in the evidence system, the commander will be required to provide a corrective action plan to their respective Division with a resolution date. Additionally, the commander will be required to provide documentation verifying the plan was implemented and successful. Some identified discrepancies, such as those involving drugs, guns, or money, may require the entire evidence system to be inventoried and inspected to ensure its integrity. If further discrepancies are revealed, the entire evidence/property system shall be inspected and inventoried to ensure compliance with policy and legal statutes. If there are ten items or less in the evidence/property system, 100 percent of the items shall be inspected and inventoried. Should there be no discrepancies, then the Sergeant would complete the proper forms and disseminate them for review.

After each audit is performed, an independent employee not directly involved in evidence processing, would review the audit details and make recommendations to the department, should

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any unforeseen issues arise. The independent employee would be properly trained not only the proper way to handle evidence per the law, but is also versed on the department's policy and procedure. The civilian auditor does not necessarily need to have an affiliation with the Department, city and/or county. However, having a civilian that was properly vetted (a background check was performed) will ensure that any confidential information that the civilian may be exposed to stays within the department and not shown to the public.

This position does not necessarily have to be one person. Larger departments may have the need to have groups who help conduct audits/inspections to not only ensure accuracy and thoroughness but also timeliness. If a position such as a "Civilian Evidence Auditor" is not currently described in a department's matrix and budget, then it must be created. The creation of the position may be timely. Factors such as salary, benefits, specific job function, and title need to be addressed. Once these details are completed, approval from the City Manager and Council, County Board of Supervisors, and/or governmental oversight may be necessary. If approved, then the selection process will begin. Due to the importance of the position and the fact the person may be handling very important items, a thorough background should be completed. This will also add to the level of transparency for the community but also the safe handling of the evidence.

Additionally, during the annual audit, using a third-party vendor to come in and complete an internal review of the evidence/property can assist in keeping the transparency between the public and the law enforcement agency. Having a third party or outside vendor will help minimize any biases, it can also be quite costly. Keeping in mind fiscal responsibility, the agency head can have the option, should it be necessary to assign a third-party vendor at his/her

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own discretion or if more than a certain percentage of evidence/property are mishandled or inaccurately documented.

Once the position is implemented and an audit review has been completed, the assigned sergeant will prepare a report which is reviewed by the department's administration, including the Division Commanders and the agency head. Upon approval of the findings, releasing the findings to the public may in fact enhance public trust. This can be done simply by the agency head reporting the findings during a city council/board of supervisors meeting or possibly even releasing a written document, pending any confidential information being redacted, to the general public. Either way, the goal of the audit and performance of the position is to enhance public trust with law enforcement. As more and more audits are completed and findings are released, the public will see their law enforcement officers are doing the right thing. On the contrary, if there is a problem, intentional or not, addressing the problem and punishing the individual responsible will also show the public if there is a problem evidence audit that accountability is paramount and everyone will be held accountable for their role, no matter what capacity.

Much like in use of force cases, an investigation, possibly by a third party may be warranted. With evidence, the same can occur. Between 2015 and 2018, the Orange County Sheriff's Department (CA) had to review approximately 22,000 cases due to evidence booking scandal. Fifteen deputies were referred for prosecution and five of them were fired (City News Service, 2020, para. 3). Luckily, this Sheriff's Department caught the problem and resolved it appropriately before the federal government got involved. Federal government involvement could have been devastating for the law enforcement agency.

Reallocating a Sergeant to oversee the proper collection and handling of evidence as well as including a civilian auditor will have a short-term cost increase to the department in the form of salary and benefits. With that being said, in the long term, it will help department's get ahead of any scandals or illegal acts that may be occurring, which will cost the law enforcement agency considerably more should litigation be necessary. Also, should oversight not be implemented, not only may the federal government impose sanctions, such as consent decrees on the organization, but on a public forum, may be extremely embarrassing. The public will lose trust in their law enforcement agency, and in a worst-case scenario may even attempt to have another law enforcement agency take over.

Conclusions and Recommendations

Establishing a Compliance and Ethics program in a police department can assist personnel by improving their understanding of departmental expectations, enhance employee safety, and minimize liability. There are a multitude of variations, options, and possibilities available for law enforcement agencies to integrate a Compliance and Ethics program into their respective departments. These nuances allow for a police department to create a program that can be tailored to fit their respective political, geographic, deployment, population, and/or jurisdictional variances. Police officers are human beings and employees of a police department analogous of a worker at any other company. They will make mistakes, look for ways to make their job easier, and may not always provide stellar customer service. This should be expected by the management of any organization. It is not a matter of if, but rather, when a police officer blatantly violates a law, departmental policy/procedure, or strays outside the expected ethical and moral code of conduct, the identified need for a Compliance and Ethics program is strengthened.

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Police agencies need to swiftly identify and address the root cause of misconduct, waste, fraud, or abuse and implement control measures to minimize or eliminate future occurrences.

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