Los Angeles County
Metropolitan Transportation Authority

Metro

GENERAL MANAGEMENT
Public Safety Analytics Policy

(GEN 63)

POLICY STATEMENT

Metro is committed to providing safe and equitable transit services to all patrons. Discriminatory conduct on the basis of an individual's actual or perceived race, religion, color, ethnicity, national origin, age, gender, gender identity, gender expression, sexual orientation, disability, immigration, or employment status, English language fluency or homeless circumstance, is prohibited while performing any Metro activity. Metro has a zero-tolerance policy for any form of confirmed bias or discrimination and ensures all safety and security activity is conducted without discrimination, racial profiling, and bias. In deploying resources, Metro takes into consideration information and data from a variety of platforms and sources, to include public feedback. Metro has drafted the Public Safety Analytics policy to ensure that any use of internal and internal data sources is done in a manner that averts racial profiling and discrimination and holds personnel accountable for actions inconsistent with Metro policies.

PURPOSE

Metro is committed to protecting the constitutional and civil rights of all people as outlined in Title VII of the 1964 Civil Rights Act and the Americans with Disability Act (ADA). The purpose of this policy is to emphasize the agency's commitment to the collection and use of fair and bias-free public safety analytics and data and the fair and bias-free treatment of all people. This policy reaffirms Metro's pledge to bias-free practices as declared in its *Bias-Free Policing Policy*. Metro will ensure the use of all data will be done in a bias-free, non-discriminatory manner in its deployment of security and law enforcement services.

APPLICATION

This policy applies to all Metro employees and contractors. Contracted law enforcement entities will be advised of the existence of this policy and required to adhere to it.

_____	_____	_____
APPROVED: County Counsel or N/A	Department Head	ADOPTED: CEO

Effective Date: _____

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(GEN 63)

1.0 GENERAL

All individuals having contact with agency personnel shall be treated in a fair, impartial, bias-free, and objective manner, in accordance with the law, and without discrimination. Consistent with its commitment to bias-free policing, Metro pledges to utilize any data or information gathered in a manner that averts racial profiling.

In deploying resources, Metro considers information provided from a variety of platforms. These include, but are not limited to, bus and rail incident reports, the Customer Comment Analysis Tracking System (CCATS), CCTV, customer and employee surveys, dispatch calls for service, law enforcement crime statistics, intrusion alarms, social media, and the Transit Watch App. Examining data from these various platforms enables Metro to deploy its array of resources strategically. Examples of Metro resources include Transit Security Officers, non-law enforcement alternatives such as homeless outreach specialists, and Metro Transit Ambassadors.

2.0 DEFINITION OF TERMS

Title VII - Title VII of the 1964 Civil Rights Act prohibits discrimination on the basis of race, color, or national origin by recipients of federal financial assistance.

Americans with Disability Act (ADA) - Federal law that prohibits discrimination on the basis of disability. To be protected by the ADA, you must have a disability or relationship with an individual with a disability.

Fair and Bias-Free Treatment - Conduct of agency personnel and contractors wherein all people are treated in the same manner under the same or similar circumstances irrespective of specific characteristics.

Discrimination - Any adverse act or failure to act based on race, color, national origin, religion, sex, age, disability, ancestry, medical condition, marital status, sexual orientation, gender identity, gender expression, or any other basis protected under applicable federal or state law.

Racial/Ethnic Profiling - Suspecting someone of having committed an offense based on the individual’s race, ethnicity, or national origin rather than relevant information specific to the individual or conduct in question.

DRAFT

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Protected Classes - Race, ethnic background, national origin, immigration status, gender, gender identity/expression, sexual orientation, religion, socioeconomic status, age, disability, or political affiliation[1].

3.0 IMPLEMENTATION

3.1 Use of Analytics

Analytics can assist in the proper deployment of emergency services, safety and security technology, and resources that improve the customer experience for all customers. Metro's use of analytics is intended to provide awareness of risks and issues that could potentially adversely impact Metro's bus and rail services and the viability, availability, and equitable deployment of Metro public safety and security resources. Analytics will be leveraged in a manner consistent with Metro's policies which promote the fair and impartial treatment of patrons, consistent with constitutional and statutory mandates.

3.2 Data Sources

Metro leverages information from a variety of sources and data sets to include:

- Calls for Service reports
- Vehicle maintenance requests
- Transit Watch App Incident reports
- Law Enforcement Service Requests (LESR)
- Incident reports
- Customer Comment Analysis Tracking System (CCATS)
- Customer Experience surveys
- Intrusion alarms at Metro facilities
- Trend reports from homeless outreach teams
- Justice Equity Need Index
- Justice Equity Services Index
- Everbridge alerts
- Feedback from frontline employees, e.g., bus operators and custodians

Metro will cite the instances and circumstances for the use of any external data sets outside of Metro holdings.

[1] This list is not exhaustive but is intended to identify the factors that are most likely to produce differential decisions on the part of law enforcement. The definition of protected classes is consistent with the following laws; Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), and the Rehabilitation Act of 1973.

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3.3 Use of Demographic Data

Metro will only leverage demographic data in a limited capacity to provide information necessary to provide information to the public and law enforcement on persons who present a direct threat to public safety (active shooter, terror suspect, robbery suspect). At no point will the use of demographic data be leveraged to inform or support the deployment of Metro's public safety resources. All data sources which utilize demographic data will be audited every 90 days by Metro's Chief Civil Rights Officer or designee to ensure compliance with Metro policies on discrimination and bias.

3.4 Use of External Reports

Metro's analytics program's use of external reports will be limited in scope and nature. Examples of such external reports include:

- U.S. Annual Crime Trends Report
- Incident reports from transit systems across the United States
- Incident reports from corporate partners
- Public BOLOs from law enforcement partners articulating safety and security threats to patrons and operators
- Information Awareness Bulletins from the Federal Bureau of Investigations (FBI) and the Department of Homeland Security (DHS)
- Joint Special Event Threat Assessments from FBI, DHS, and other state and local partners
- Reports generated by the Joint Regional Intelligence Center (JRIC)

All external reports will be documented and SSLE will ensure compliance with Metro policy.

3.5 Analytics Tools

Programs and tools used to support Metro in data analytics will include the following:

- ArcGIS
- Microsoft Power BI
- Microsoft Excel

An analytics tool policy will be drafted to ensure the usage of each program is consistent with this policy.

3.6 Report Types

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Metro will leverage the aforementioned data to generate the following reports to provide awareness of safety and security issues across the system[2]: Metro will ensure all products are accessible to the public.

- Emerging trends reports
- Analysis of security incidents impacting rail and bus lines
- Analysis of issues impacting employee and rider safety
- Be On the Look Out (BOLO) reports on persons posing safety risks to operators and riders
- Vandalism trend reports

3.7 Data Gathering, Quality, and Context

Data serves as the foundation for all analytics products and its quality determines how much a decision maker and stakeholders can trust the findings and implications. Data quality is a measure of the condition of data based on factors such as accuracy, completeness, consistency, reliability, and whether it is up to date. All data utilized by the program will be assessed for data quality. Metro will operate from a zero-trust model in which all data will be verified for quality prior to incorporation into analysis, reports, and findings.

Equally as important as the gathering method and quality of data context. Data context is important as it limits assumptions and biases which could adversely impact the quality of the data. All data utilized within reports and products will be caveated with the following information:

- Data source
- Time range
- Data scope

4.0 RESPONSIBILITIES

4.1 Compliance

The Chief Executive Officer will ensure all agency personnel responsible for data collection, analysis, and deployment of Metro resources are familiar with the content of this policy and adhere to it.

[2] This is not an exhaustive list but represents examples of Metro products.

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Reports relating to violations of this policy shall be provided to the Chief Executive Officer or their designee in a manner most suitable for administrative review, problem assessment, and development of appropriate supervisor-level and/or executive-level corrective actions.

4.2 Training

Metro requires annual implicit bias training for all employees. In addition to required training, Metro will coordinate with the PSAC and Community-Based organizations to identify and vet training curriculum opportunities on topics such as cultural awareness. Additionally, for data analytic practitioners, training will be provided to address state and federal legislation on data privacy, data, and standards.

4.3 Monitoring Performance and Key Performance Indicators (KPI)

- SSLE will conduct quarterly reviews of security and analytic reports to confirm compliance with this policy. This includes reports that feature demographics, personal identifying information, or law enforcement or Metro-derived BOLOs.

- SSLE will ensure all agency personnel involved in public safety analytics maintain 100% annual compliance in attending and completing all related bias and discrimination training.

- SSLE will address all complaints and will conduct a quarterly review of customer comments and complaints to ensure compliance with this policy.

- SSLE will continually evaluate Key Performance Indicators (KPI) to effectively measure success and assess the impacts of the analytics program.

- KPI results will be published in a public facing dashboard.

5.0 FLOWCHART

Not Applicable

6.0 REFERENCES

- Title VII of the 1964 Civil Rights Act
- CIV 5- LACMTA Civil Rights Policy
- CIV 4- Internal Complaint Process
- CIV 13- Title VI Equity Policies
- GEN 42- Customer Complaints

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- IT 12- Security Incident Reporting and Response Policy
- GEN 64 Bias-Free Policing Policy

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