

**Policy Statement from the Civil Liberties Committee
of the Chicago Council of Lawyers**

**Chicago Needs To Report More Comprehensive Data About How It
Processes Complaints Against Police Officers**

Gordon Waldron, July 2015.

The Independent Police Review Authority (IPRA) is transparent as to how it processes complaints of police misconduct. The Bureau of Internal Affairs of the Chicago Police Department (BIA) is much less transparent. Although it posts on its web site information about the types of complaints it receives, it posts there no information about what it does with them. Although, the Police Superintendent presents to the Chicago Police Board some information about BIA's findings on those complaints, that information is not widely known, and it is of little use because it lumps together information that should be reported separately. It lumps together data on (a) complaints that BIA processes, and b) those that it refers to police districts for processing. It also lumps together data on a) complaints by supervisors of violations of personnel and organizational rules¹, and b) complaints made by individuals about police misconduct, including allegations of deprivations of Constitutional rights. (See article posted on this web page on July 2, 2015.)

BIA should be required to publicly report as much data as does IPRA, and it should be required to break down that data into the four categories listed above. IPRA should be required to report slightly more information as to the complaints within its jurisdiction.²

I. The Chicago City Council should require BIA to report, both quarterly and annually, aggregate data similar to that required of IPRA.

No ordinance requires BIA to report aggregate data on how it processes complaints. The City Council should require BIA to create and publicize both quarterly

¹ There may be little need for BIA publicly to report on its processing of internal complaints by supervisors. But since it does so, the recommendations below are made in light of that practice.

² By ordinance, IPRA is responsible for investigating complaints alleging excessive force, coercion with a threat of violence, bias-based verbal abuse, and domestic violence by an officer. All other complaints against the police are within BIA's jurisdiction.

By ordinance, IPRA is also responsible for investigating cases in which an officer "discharges his or her firearm, stun gun, or Taser in a manner which potentially could strike an individual, even if no allegation of misconduct is made." This essay does not address the issue of what information IPRA should report to the public about those investigations.

and annual reports that disclose as to complaints within its jurisdiction the same information that Section 2-57-110 of the Chicago Municipal Code requires of IPRA, with the following changes:

a) BIA should be required to break down the aggregate data it reports on complaints within its jurisdiction as to a) complaints it investigates; b) complaints it refers to the police districts for investigation; c) complaints of violations of Police Department personnel and operational rules; and d) all other complaints within BIA's jurisdiction.

b) BIA should also be required to follow the changes we recommend in Section II below as to IPRA.

II. The Chicago City Council should make the Following Changes as to IPRA reporting.

The City Council should amend the ordinance establishing IPRA to require IPRA to make the following changes in reporting:

A. IPRA should file annual reports by April 1 of the following year.

IPRA used to publish annual reports, but has stopped doing so. Both IPRA and BIA should be required to publish annual reports by April 1 of the following year so that the public may better identify trends in complaint processing.

B. IPRA should list in its quarterly and annual reports the number of each type of complaint and total number of complaints filed within its jurisdiction.

IPRA should be required to list in its quarterly and annual reports the number of each type of complaint filed within its jurisdiction (excessive force, coercion with a threat of violence, bias-based verbal abuse, and domestic violence by an officer), and the total number of all such complaints.

BIA annually reports similar information. Both BIA and IPRA should be required to do so.

C. IPRA should list in each quarterly report the number of complaints filed against each police officer in each district and unit in the last 12 months. It should list such data in each annual report for the last 24 months.

IPRA is currently required to list each quarter "without identifying any individual, the number of complaints filed against each police officer in each district and unit since **the last report.**" Its quarterly reports do so in a format that looks like this:

District 015

Members 1-22: 1 complaint each
Members 23-26: 2 complaints each
Member 27: 3 complaints

But in each quarter, IPRA assigns to each a member a new identifying number (such as Member # 27), so you cannot tell, for instance, whether Member #27 above, named in 3 complaints in one quarter, is also listed in other quarterly reports.

As a result, IPRA should be required to publish each quarter the number of complaints filed against each police officer in each district and unit in the last 12 months. It should report such data for the prior 24 months in its annual reports.