



## **Policy Advisory Report on Sexual Misconduct and Trauma-Informed Victim Services: *Research Proposal***

*Requests approval from the Community Oversight Board for a Policy Advisory Report on the absence of Metro Nashville Police Department (MNPD) policy specific to Sexual Harassment and Misconduct, lack of training on trauma-informed services, the potential impact of such omissions, and policy resolutions.*

### **Background and Broader Impact**

#### *Sexual Misconduct*

On November 21<sup>st</sup>, 2022, the Metro Nashville Community Oversight Board (COB) hosted Greta McClain, the Executive Director of Silent No Longer Tennessee, at its monthly Board Meeting. Silent No Longer Tennessee describes itself as<sup>1</sup> “a grassroots organization of sexual assault victims, survivors and allies dedicated to helping those in our [communities] who have also been affected by sexual violence by offering unique opportunities for empowerment, and involving the entire community in the effort to end sexual violence.”

At that November meeting, Director McClain described being in communication with over 70 current and former MNPD employees who had complaints of sexual harassment, sexual assault, gender discrimination, racial discrimination, and retaliation. Director McClain called on the COB, Mayor Cooper, and members of Metro Council to institutionalize policies to protect MNPD employees from these issues. Specifically, they seek MNPD policies that:

- Create a Zero Tolerance policy around sexual assault and sexual harassment,
- Handle harassment or hostile workplace complaints and expeditiously communicate their resolution to the parties,
- Consult with the Sexual Assault Center, the YWCA, and other related community organizations to conduct a blind review of complaints and policy,
- Adopt the IACP and DOJ’s recommendations for how to conduct sexual assault/harassment complaints within MNPD,
- Create a blind review team consisting of an MNPD OPA supervisor, Metro HR supervisor, sexual assault advocate, and a DV advocate to conduct a random review of completed and in-process investigations at least once per calendar year,
- Create an investigative board staffed with an OPA investigator, senior sexual assault and/or domestic violence detective or supervisor, COB investigator, and Assistant DA or DA investigator to conduct officer involved sexual violence, DV, or retaliation investigations, and
- Have specific policies on mandatory reporting, retaliation, and screening.

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<sup>1</sup> Per <https://silentnolongertn.org/who-we-are>

Director McClain is amplifying a series of longstanding issues within MNPD. Reporting from WPLN that includes interviews with former MNPD employees, lawsuits, internal complaints of discrimination, as well as both demographic and disciplinary data showed that minority employees, particularly Black women, faced higher rates of severe discipline than their white colleagues within MNPD. The report describes a culture of harassment, abuse, and discrimination; behind the Department's so-called 'blue wall', there is reportedly "a toxic culture of misconduct and retaliation had scared many into silence."<sup>2</sup>

According to research done by Lonsway and colleagues, upwards of 94%<sup>3</sup> of female employees in law enforcement in the United States have experienced some form of workplace sexual harassment, most often in the form of unwanted verbal harassment. While women are broadly more likely to experience sexual harassment, this is especially true in male-dominated fields such as law enforcement.

A considerable body of research demonstrates that sexual harassment is more common in professions that are nontraditional for women (i.e., where the majority of employees are male...) as compared to fields where women are traditionally employed.

– Kimberly Lonsway, Rebecca Paynich, and Jennifer Hall<sup>4</sup>

Despite these staggeringly high numbers, only ~15-20% of victims formally complain, citing fear of retaliation, perceived non-seriousness of the behavior, and the belief that nothing would be done as major reasons for not reporting the misconduct. Unsurprisingly, such experiences often have negative effects on personal as well as professional outcomes, such as life satisfaction, depression, anxiety, somatization, work withdrawal, work satisfaction, coworker/supervisor satisfaction, and job stress<sup>4</sup>. Moreover, there is disparate impact of police sexual violence, which disproportionately impacts women of color, especially those who live in lower socioeconomic areas<sup>5</sup>.

Several organizations, both law enforcement and more advocacy-focused, have recognized the importance of policy safeguards specifically pertaining to sexual assault and harassment. End Violence Against Women International (EVAWI), a nonprofit dedicated to improving criminal justice responses to sexual assault, released an updated model policy aimed at Law Enforcement Sexual Misconduct Prevention and Accountability. They write that "[e]fforts to address law enforcement sexual misconduct do not take place in a vacuum. Rather they reflect the growing national and international demand to improve responses to all forms of sexual harassment and assault, including in criminal justice settings."<sup>6</sup>

Additionally, the International Association of Chiefs of Police (IACP), a nonprofit aimed at advancing policing via advocacy, research, outreach, and education, also released policies on Sexual Harassment and Sexual Misconduct<sup>7</sup>. They suggest that by "developing comprehensive policies [that clearly define and prohibit sexual harassment and sexual misconduct], law enforcement executives take a critical step in displaying the necessary leadership and holding the agency and its employees accountable."

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<sup>2</sup> Max, Samantha. "Behind the Blue Wall: Officers Describe a 'Toxic' Culture within Metro Police. September 29, 2021. <https://wpln.org/post/behind-the-blue-wall-officers-describe-a-toxic-culture-within-metro-police/>

<sup>3</sup> Note that this figure comes from a study with the highest reported rate of harassment seen in the literature. Most other studies fall in the 50-75% range.

<sup>4</sup> Lonsway, Kimberly A., Rebecca Paynich, and Jennifer N. Hall. "Sexual harassment in law enforcement: incidence, impact, and perception." *Police Quarterly* 16.2 (2013): 177-210.

<sup>5</sup> Purvis, Dara E., and Melissa Blanco. "Police sexual violence: Police brutality, #MeToo, and masculinities." *California Law Review*. 108 (2020): 1487.

<sup>6</sup> [https://evawintl.org/wp-content/uploads/2020-02\\_TB-Model-Policy-Resource-LESM-Prevention-and-Accountability.pdf](https://evawintl.org/wp-content/uploads/2020-02_TB-Model-Policy-Resource-LESM-Prevention-and-Accountability.pdf)

<sup>7</sup> <https://www.theiacp.org/resources/policy-center-resource/sexual-harassment-and-misconduct>

Finally, the Department of Justice (DOJ) has released guidance for law enforcement agencies on identifying and preventing gender bias via sexual assault and domestic violence<sup>8</sup>. One principle of that guidance is to “implement policies to prevent officer-perpetrated sexual assault and domestic violence and hold officers who commit these offenses accountable.” Law enforcement agencies are advised to “develop policies and practices aimed at preventing and addressing on-duty and off-duty misconduct (which includes sexual harassment, sexual assault and abuse, domestic violence, and related misconduct perpetrated by LEOs).”

While MNPD has a broad policy on Harassment and Discrimination, adopting a policy such as that of EVAWI or the IACP *specific* to sexual misconduct would adhere more closely to the recommendations of these organizations. To this point, the ‘Purpose’ section of EVAWI’s model policy reads that:

“This agency acknowledges the responsibility of law enforcement to proactively develop policies, procedures, training, and supervision to prevent and effectively address any sexual misconduct committed by agency personnel, whether sworn or civilian. By developing and implementing this policy, our agency is taking a leadership position to address the serious problem of law enforcement sexual misconduct, and to model best practices and accountability for the law enforcement profession.”<sup>6</sup>

#### *Victim-Centered, Trauma-Informed Training*

Ending gender-based violence in policing requires internal protections for employees as discussed above in addition to strong external protections for civilians that feature a comprehensive, victim-centered approach. To this end, at its December 12<sup>th</sup>, 2022, Board Meeting, the COB discussed a Proposed Resolution Report (CC2021-016) that highlighted potential issues with Departmental training with respect to a trauma-informed, victim-centered response. The complaint summary reads in part:

*The Complainant saw a woman who reported to her that she had been the victim of a sexual assault. The woman had already called 911 when the Complainant made initial contact, but the woman was having difficulty describing her location to the person on the phone. The Complainant provided that info to the 911 operator and waited for officers to arrive.*

*The Complainant said that when she restated a question about whether the victim would receive support from an advocate at the hospital, Officer-1 cut her off and said, “We need to get a statement, and she’s not being very cooperative.” The Complainant reports saying, “She has been raped; she is in shock.” The Complainant alleged that Officer-1 gave her an angry look and said, “She might be, or she might be on some type of intoxicant.” When she responded, “Both can happen at the same time,” Officer-1 responded, “I know my job, ma’am.”*

*The Complainant said when she asked again about an advocate or crisis counselor, Officer-1 said angrily “We’re going to follow [the victim] there, try to get better information. We will get our investigators out there and get her any type of counseling she wants.” The Complainant then replied, “In my experience, she will give a better statement if there is someone there who is trained in rape crisis who is there with her to help you do your job.”*

Unfortunately, this sort of treatment occurs all too frequently within law enforcement. This presents particular difficulty given that law enforcement officers are often victims’ first point of contact with the criminal legal system. Survivors of sexual assault are often met with skepticism or mistreatment when reporting their experience to law enforcement<sup>9</sup>, which can cause secondary trauma as the survivor is

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<sup>8</sup> See: <https://www.justice.gov/ovw/page/file/1509451/download>

<sup>9</sup> Murphy-Oikonen, Jodie, et al. "Unfounded sexual assault: Women’s experiences of not being believed by the police." *Journal of Interpersonal Violence* 37.11-12 (2022): NP8916-NP8940.

revictimized<sup>10</sup>. The experience of secondary trauma unsurprisingly reduces future engagement with the criminal legal system<sup>11</sup>, which is the strongest predictor of arrest in sexual assault cases<sup>12</sup>. This revictimization is often in part due to poor training of law enforcement officers, who have been shown to rely on rape myths, stereotyped beliefs about sexual assault and victim behavior, and a misunderstanding of the neurobiology of trauma<sup>10</sup>. Non-conformance with stereotypes of what a survivor 'should' look like can thus impact how law enforcement evaluates and investigates their case.

Experiences such as the one described in the PRR above have furthered calls for police officers to receive training in victim-centered, trauma-informed techniques that are attentive to the specific needs and circumstances of those who have just been assaulted. These calls have come from a range of organizations, again both from EVAWI and the IACP, and have led to the development of multiple trainings and toolkits that are making their way into the field.

The goal of the IACP's training, for example is to "provide officers with information about the neurobiology of trauma (e.g., natural biological responses to trauma), rape myth acceptance, and investigative techniques that can reduce secondary trauma, facilitate victim well-being, and increase victim engagement with investigators."<sup>10</sup> While well-intentioned and reasonably accessible, these types of trainings are infrequently taken up by departments and are sparsely evaluated. Such trainings should be evaluated against officer performance, taught in real-world, experiential settings that incorporate simulated victim interviews, and should be much more widely taken up by departments across the country.

The Civil Rights Division of the Department of Justice has opened up several civil pattern or practice investigations centered around gender-biased policing and sexual assault investigations in police departments. Take, for example, the investigation into the New York Police Department's Special Victims Division. Assistant Attorney General Kristen Clarke, speaking on the investigation, said "Survivors of sexual assault should expect effective, trauma-informed and victim-centered investigations by police departments... Based on information provided to the Justice Department, we find significant justification to investigate whether the NYPD's Special Victims Division engages in a pattern or practice of gender-biased policing. Investigations into sexual assault that comply with the Constitution promote accountability, enhance public safety and foster community trust."

This is not a suggestion that MNPDP is at risk of being under such an investigation, but does suggest an area of improvement and a potential avenue for the Department to be on the cutting edge of training. Consent decrees or pattern and practice investigations often provide departments with resources that are representative of the best practices across the country and should be treated as such.

#### *Internal Review*

MNPDP's Office of Professional Accountability (OPA) is responsible for classifying and reviewing all complaints made to OPA, directing those investigations, making recommendations regarding the disposition of cases, and ensuring consistency for proposed discipline<sup>13</sup>. As such, if there are complaints of sexual misconduct or of improper treatment of an assault victim made to OPA, it is their charge to determine if and how such complaints should be investigated.

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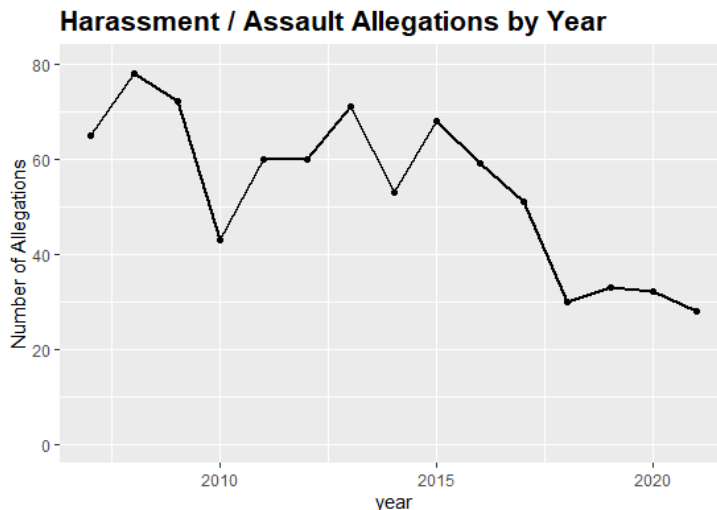
<sup>10</sup> Campbell, Bradley A., David S. Lapsey, and William Wells. "An evaluation of Kentucky's sexual assault investigator training: Results from a randomized three-group experiment." *Journal of Experimental Criminology* 16.4 (2020): 625-647.

<sup>11</sup> Lorenz, Katherine, Stacy Dewald, and Rachel Venema. "'I Was Worried I Wouldn't Be Believed': Sexual Assault Victims' Perceptions of the Police in the Decision to Not Report." *Violence and Victims* 36.3 (2021): 455-476.

<sup>12</sup> Lapsey Jr, David S., Bradley A. Campbell, and Bryant T. Plumlee. "Focal concerns and police decision making in sexual assault cases: A systematic review and meta-analysis." *Trauma, Violence, & Abuse* 23.4 (2022): 1220-1234.

<sup>13</sup> <https://www.nashville.gov/departments/police/chief-police/professional-standards-division>

OPA provides the COB with data on all complaints to its office. While the data extends back to 2005, 2007 is the first full year of data that the COB has access to. While far from the most frequent complaint received, OPA receives complaints relating to harassment and assault regularly. When allegations are grouped<sup>14</sup> by type of misconduct, the number of complaints that are related to assault or misconduct can be seen below:



While these raw numbers are troubling in and of themselves, they are very likely an undercount of all sexual misconduct within the Department. Interestingly, the vast majority (87.7%) of harassment or assault allegations that OPA receives are citizen-initiated; this contrasts with a much smaller proportion of overall OPA complaints (42.9%) that are citizen-initiated. While this could indicate that harassment and assaults are occurring to or being reported more frequently by citizens, another explanation is that internal complaints of harassment or assault are being resolved elsewhere within MNPd.

This is a distinct possibility, given that MNPd employees have a variety of channels to report harassment or assault. MNPd’s policy on Harassment and Discrimination indicates that people can file complaints of harassment or discrimination with their supervisor, the Human Resources Division Commander, the OPA, the Chief of Police, or the Metro Government Equal Employment Opportunity Coordinator. OPA is thus responsible for investigating any complaint alleging harassment and/or discrimination **that is reported to OPA**. Given the volume of channels through which victims could report harassment and/or discrimination, however, it is likely that there are many complaints regarding sexual misconduct to which the COB does not have access. Further, OPA’s SOP reads that

*“OPA will investigate complaints or allegations of serious misconduct against employees of the Department...”*

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<sup>14</sup> OPA does not group allegations prior to sending data to the COB; as such, these groupings are internally generated by COB staff. Allegations that are categorized as ‘Harassment/Assault’ include discrimination, harassment, domestic violence, abusive conduct, intimidation, racial profiling, biased policing, and assault. It is possible, perhaps likely, that these estimates are an under-count, as allegations were not coded when they contained only vague allegations such as ‘Adherence to Law’. While sexual assault could certainly be coded as Adherence to Law, which is defined as the prohibition of “engaging in conduct, on or off-duty, which constitutes an offense under the laws or ordinances of the United States or any subdivision,” other offenses could fall under this umbrella term as well. In order to maintain specificity of the category, codes such as this were excluded.

- C. *Allegations regarding minor misconduct such as rudeness will be documented, and forwarded to a ranking officer in the employee's chain of command for investigation.*
- D. *In incidents involving alleged criminal misconduct, the Chief of Police may assign the investigation to a specialized unit either within or outside the department. OPA may conduct a parallel administrative investigation.*
- E. *All other complaints received by OPA will be referred to the Director of the Professional Standards Division, or his/her designee, for assignment or referral."*

One area of concern is that neither "minor misconduct" or "serious misconduct" are defined within the SOP, nor is either defined in MNPDP's manual. This makes it challenging, if not impossible, to understand which cases are being referred to an officer's supervisor and why, including whether sexual misconduct is considered serious, minor, or criminal. Such an opaque process introduces many potential avenues for biased or otherwise improper behavior to be introduced, and could provide an avenue for the diminishment of such complaints.

Charlotte Guerra of the Seattle University School of Law succinctly defines the problem, writing<sup>15</sup> "If [a] complaint is only classified under 'requiring supervisor action'<sup>16</sup>, the complaint might effectively disappear into a black hole wherein a supervisor merely has a conversation with the officer against whom the complaint was raised." Further, Professor Mary Fan of the University of Washington School of Law writes that<sup>17</sup> "[W]hat constitutes a minor policy violation can be very much in the eye of the beholder. For example, being quick to resort to rude treatment, cussing at community members, and otherwise escalating rather than de-escalating encounters to raise the risk of use of force can be a serious problem from a harm prevention perspective, even if it is perceived as a minor transgression by the officer in a specific incident, viewed in isolation."

As previously established, survivors of sexual assault often have their experience misunderstood by law enforcement; this in combination with Departmental discretion to direct complaint investigation causes COB staff great concern. Complaints such as those outlined in CC2021-016 might not receive the rigorous investigation and oversight that they deserve.

### **Proposed Study**

The study at hand will aim to provide an in-depth analysis of MNPDP's sexual misconduct policy, the misconduct of current and former officers, and the mechanisms in place to hold officers accountable for their behavior. Further, it will evaluate the training that officers receive on victim-centered, trauma-informed techniques, and make recommendations to fill the gaps on such training. An important consideration for any training, as established in a 2015 Department of Justice report<sup>18</sup>, is that supervisory protocols and accompanying accountability systems are a key consideration in ensuring that

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<sup>15</sup> Guerra, Charlotte. "Living under the boot: Militarization and peaceful protest." *Seattle Journal for Social Justice* 14.2 (2016): 231-288.

<sup>16</sup> 'Supervisor action' is the equivalent of a chain of command investigation in MNPDP.

<sup>17</sup> Fan, Mary D. "Body Cameras, Big Data, and Police Accountability." *Law & Social Inquiry*, vol. 43, no. 4, 2018, pp. 1236–1256., doi:10.1111/lsi.12354.

<sup>18</sup> See: <https://www.justice.gov/opa/pr/justice-department-issues-guidance-identifying-and-preventing-gender-bias-law-enforcement>

officers are not engaging in gender biased policing. A department can have the best training program around, but if there is not appropriate buy-in and structure at the supervisory level, it may still fall short. As such, this study will evaluate what supervisory structures currently exist, and will make recommendations to enhance and build out such structures.

### *Guiding Questions*

1. What policies does MNPDP currently have in place to screen, train, and hold officers accountable for sexual misconduct that occurred prior to or during their employment with MNPDP?
2. How are complaints of sexual misconduct assigned and investigated by the various oversight methods within MNPDP, including but not limited to OPA and precinct investigations?
  - a. What are the outcomes through these various channels? Is there differential impact based on where a complaint is investigated?
3. Is the policy that MNPDP currently has in place regarding sexual misconduct sufficient?
  - a. How do these policies compare to national best standards, as well as other peer agencies?
4. Has MNPDP's investigation and imposed discipline regarding complaints of sexual misconduct been appropriate?
5. What has the experience been of individuals who have been sexually harassed or assaulted by members of MNPDP?
  - a. This includes those who were formerly employed by MNPDP as well as the general public.
6. How are "minor misconduct" and "serious misconduct" defined by OPA?
  - a. How prevalent are these types of misconduct?
  - b. What is the oversight of such complaints, either within MNPDP or OPA?
7. What type of victim-centered, trauma-informed training do officers currently receive? Is it sufficient?
8. What supervision protocols and accountability systems currently exist to ensure officers follow existent policy on sexual misconduct? Is this system sufficient?

### **Methodology**

First, standard operating procedures (SOPs) and policy will be reviewed from the Background and Recruitment section to determine what sort of screening mechanisms MNPDP employs to evaluate past sexual misconduct of applicants.

Next, training materials, SOPs, and policy will be reviewed for the Training and Human Resources divisions to determine what pre-existing content exists regarding sexual misconduct and on victim-centered, trauma-informed training. Further, MNPDP's manual and its existent harassment and discrimination policy will be reviewed and evaluated. Part of this evaluation will address what supervision protocols and accountability systems currently exist to ensure officers follow existent policy on sexual misconduct.

Next, interviews will be conducted with individuals within the OPA, MNPDP's Human Resources Division, with the Metro Government Equal Employment Opportunity Coordinator, as well with several precinct

Commanders<sup>19</sup> to understand their protocols for categorizing and assigning sexual misconduct complaints, and to understand the process for determining which complaints are investigated by which entities, including but not limited to the officer's chain of command and the OPA.

Next, interviews will be conducted with individuals within MNPDP's Strategic Development Division, Planning Section, Training Division, Domestic Violence Division, and Special Victims Division. These interviews will be conducted in an attempt to understand existing mechanisms in place to guard against sexual misconduct within MNPDP, including but not limited to training, policies, and SOPs. Further, the interviews will assess the availability of victim-centered, trauma-informed training that currently exists within the Department.

Collectively, this phase of the data collection process should afford MNCO with an understanding of the policy landscape that currently exists within MNPDP regarding sexual misconduct. An evaluation of policy will then transpire, guided in part by documents such as the IACP's 'Agency Self-Assessment' and 'Community Assessment' tools within their guide on 'Proactive Approaches to Sexual Violence'<sup>20</sup>.

#### *Data*

Next, MNCO will request data on all cases of sexual misconduct from OPA, MNPDP's Human Resources Division, Metro HR, and from each precinct. Specifically, we will request the case file (including the Incident Report and Form 312s<sup>21</sup> as available) for each complaint; data on the misconduct that precipitated each complaint; the case outcome status (sustained, not sustained, etc.); and the discipline imposed, if any. If necessary, public records requests will be submitted, though pursuant to the COB's Memorandum of Understanding<sup>22</sup> with MNPDP, these records would qualify as records that should be provided to the COB "on an expedited basis upon receipt of a written request".

Next, MNCO will request data from OPA that they collect as outlined in their SOP. Specifically, MNCO will request data relating to the "annual statistical summary based on records of employee investigations, to be made available to the public", the "regular audit of complaints to determine the need for changes in training or policy", and the "statistical and related information to identify trends involving all complaints of excessive force and abuse of authority". Reviewing these documents will inform us as to the robustness of these accountability mechanisms. This data set, combined with the above data sets, will aim to paint a complete picture of sexual misconduct in MNPDP.

#### *Community and Stakeholder Input*

Finally, community feedback will be solicited via a multi-pronged engagement process. The first method of feedback will be carefully chosen to identify individuals who have experienced sexual misconduct by an MNPDP officer, or those who received victim services that were not trauma-informed following sexual

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<sup>19</sup> All precinct Commanders will be contacted, but it is assumed they will not all be willing and/or able to complete an interview.

<sup>20</sup> See here: <https://www.theiacp.org/sites/default/files/2020-11/7585/Printer-Friendly%20Agency%20Self-Assessment.pdf> and here: <https://www.theiacp.org/sites/default/files/2020-11/7585/Community%20Assessment.pdf>

<sup>21</sup> MNPDP Form 312 is a Complaint Report and is defined as an: Official departmental form used to document all complaints. The MNPDP Form 312 requires that a control number be assigned for internal tracking purposes prior to submission through the appropriate chain of command.

<sup>22</sup> <https://www.nashville.gov/sites/default/files/2021-03/MOU-with-MNPDP.pdf?ct=1616767674>



assault or harassment. Organizational connections such as those with Silent No Longer Tennessee may be utilized to connect with those individuals. These individuals will then complete one-on-one interviews with COB staff, who will undertake comprehensive efforts to protect the privacy and confidentiality of those who interview. The second method of feedback will be to organize a working group to craft draft policy language for MNPD to implement, both on sexual misconduct and on victim-centered, trauma-informed training. The working group will consist of organizations such as Silent No Longer Tennessee, End Violence Against Women International, Vanderbilt's Project Safe, the ACLU's Women's Rights Project, the National Sexual Violence Resource Center, the Tennessee Coalition to End Domestic and Sexual Violence, former Burlington Police Chief Tom Tremblay<sup>23</sup>, and the Nashville Sexual Assault Center. Given that best practice<sup>18</sup> is to, at the earliest possible intervention point, refer victims to a victim advocate and community resources such as rape crisis centers, DV shelters, or legal service organizations, this consideration will be discussed and considered. After initial meetings of the working group, perspective from MNPD will be incorporated.

### **Risk Assessment**

The largest risk of this research is in the protection of interviewees who have experienced sexual misconduct by members of MNPD. The ethical approach to research demands that there be an "enduring commitment to respecting people, practicing beneficence, and promoting justice," which is the baseline for research with any participants. Research on trauma and sexual violence, however, demands a higher standard. Research that is trauma-informed must center the well-being of victims in all interactions, decisions, and approaches; simply, all phases of research must be trauma-informed. Addressing exactly this point, Campbell and colleagues adapted the Ten Principles of Trauma-Informed Services for research. They apply each of the ten principles to participant recruitment, data collection, and dissemination. Each of the principles will be directly addressed and documented in the COB's research. Done correctly, research on sexual misconduct can be a positive and even potentially healing process for victims<sup>24</sup>.

### **Timeline and Schedule**

This research proposal will be presented to the Board at its January 25<sup>th</sup>, 2023 meeting. The proposed research timeline is as follows: research and data collection will be conducted in the Winter and Spring of 2023, data will be analyzed in the Summer of 2023, and a preliminary report will be produced by late Fall of 2023. The Board will receive monthly research updates on the report. Given the sensitive nature of the topic, it is recommended that the Board recommend approval on a regular track.

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<sup>23</sup> Chief Tremblay is currently working with the Chicago Police Department to implement a new sexual misconduct policy within the department.

<sup>24</sup> Campbell, Rebecca, Rachael Goodman-Williams, and McKenzie Javorka. "A trauma-informed approach to sexual violence research ethics and open science." *Journal of Interpersonal Violence* 34.23-24 (2019): 4765-4793.