



Ahmet Palazoglu
Chair, Assembly of the
Academic Senate
Faculty Representative,
UC Board of Regents

Academic Senate

Office of the President
1111 Franklin Street
Oakland, CA 94607

senate.universityofcalifornia.edu

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July 24, 2026

Staci Bias
Associate Director, Systemwide Community Safety

Re: Systemwide Review of the UCPD Gold Book

Dear Associate Director Bias:

As requested, I distributed for systemwide Academic Senate review the proposed revisions to *Systemwide Policies Applying to the University of California Police Department*, commonly known as the “Gold Book.” Nine Senate divisions and two systemwide Senate committees ([UCODE](#) and [UCFW](#)) submitted comments. These were discussed at the Academic Council’s July 22, 2026 meeting, and the compiled feedback is attached for your reference. The responses reflected a range of views. Some reviewers expressed no objection or found the revisions generally appropriate, while others recommended substantial revisions before the policies are finalized. After considering the comments, the Academic Council identified several overarching concerns and recommendations, summarized below.

Review Materials and Consultation Process

Many reviewers found the materials difficult to evaluate because it was not always clear which policies were new, which had been substantially revised, and which included only technical or legally required updates. The Academic Council recommends that future reviews include an executive summary identifying new policies, major substantive revisions, and technical or legally required changes, along with an explanation of the reasons for significant revisions.

In addition, several reviewers noted that the formal review period began near the end of the academic year and continued into the summer, leaving limited time for Senate faculty committees to meet and conduct a meaningful review. Council members also emphasized that the timing did not provide student constituencies with an adequate opportunity to review and comment on policies that directly affect students. Given the importance and volume of the Gold Book policies, the Council recommends allowing more time in the future for both faculty and student consultation and review during the academic year.

Distinctive Nature of Policing in a University Environment

The Council believes that policies governing UCPD should be tailored to the mission and setting of a public university rather than relying primarily on language designed for municipal law enforcement agencies. The Council recommends that the Gold Book affirm UCPD's role in helping the University respect and protect academic freedom, civil liberties, and expressive activity and place greater emphasis on community engagement and relationship-building.

Several reviewers urged the University to more fully consider recommendations from earlier reviews of UC policing, including the 2012 [Robinson-Edley report](#) and the 2018 [Systemwide Public Safety Task Force report](#). Taken together, these reports emphasized de-escalation, clearer limits on force, independent review and oversight, and an approach to campus safety grounded in trust and collaboration.

De-escalation and Use of Force

Many reviewers raised concerns about the policies governing the use of force. The Council recommends making de-escalation and the least intrusive reasonable means the default whenever circumstances permit, with force used only when necessary. It also recommends clearer standards, definitions, and examples to guide decisions about when force is objectively reasonable.

The Council further recommends clearly distinguishing passive resistance and peaceful noncompliance from conduct that presents a genuine threat. Several reviewers cautioned that actions such as bracing, tensing, interlocking arms, or verbally refusing to comply should not automatically be classified as active resistance in ways that authorize a higher level of force. The policies should also recognize that an apparent failure to comply may result from disability, trauma, a mental health crisis, a medical condition, or another barrier to understanding or following an officer's instructions.

Reviewers also raised concerns about provisions governing deadly force, chemical agents, kinetic-impact projectiles, pain-compliance techniques, acoustic devices, and other less lethal weapons or tactics. They called for clearer limits on when and how these measures may be used, stronger safeguards addressing their medical and public health risks, and independent review of serious use of force incidents and incidents resulting in injury.

Reviewers separately questioned whether military equipment is appropriate or necessary in a university setting. Some recommended prohibiting UCPD from purchasing, training with, or using such equipment altogether. Others said that any proposed acquisition should require a documented explanation of why the equipment is necessary and why

reasonable alternatives would not meet the same safety need. Reviewers expressed particular concern about its potential use in crowd control and responses to demonstrations.

Expressive Activity and Academic Freedom

Several reviewers noted that portions of the proposed policies appear more focused on constraining expressive activity than on protecting lawful speech and assembly. The Council recommends clearer standards for distinguishing protected conduct and peaceful noncompliance from behavior that presents an imminent safety threat. Reviewers also sought clearer guidance on who has decision-making authority and what faculty and other campus personnel are expected to do when demonstrations or disruptions occur in classrooms, laboratories, libraries, or other academic spaces. They also recommended including procedures for consulting faculty when UCPD plans for or responds to situations that may affect teaching, research, or protected expression. The Gold Book should explicitly state that protest management and enforcement must be consistent with applicable time, place, and manner policies and relevant UC guidance on campus demonstrations.

Governance, Oversight, and Transparency

The Council recommends stronger independent and community-based oversight of UCPD, with meaningful participation by UC faculty, students, staff, and other campus constituents. This should include strengthening existing campus Police Accountability Boards and establishing a comparable systemwide oversight body. These bodies should have clearly defined authority and access to the information needed to review complaints, investigations and their outcomes, serious use-of-force incidents, and major policy matters.

The Council also recommends a formal process for reviewing policies issued by campus police chiefs and ensuring that they are consistent with systemwide standards. Because the Gold Book states that local policies may carry the same authority as systemwide policies, it should specify who reviews or approves them and how UC will ensure consistency across campuses, particularly in areas such as use of force, crowd control, and weapons. The Gold Book should also clarify who has final decision-making authority during emergencies, demonstrations, arrests, and mutual aid responses and who may authorize the deployment of outside officers or specialized equipment.

The Council further recommends independent review of serious use-of-force incidents and greater transparency regarding incidents, complaints, arrests, mutual aid deployments, and internal reviews. Oversight bodies should have access to the information needed to carry out their responsibilities, while appropriate reports and aggregate data should be shared with campus communities. The Gold Book should also explain

clearly how complaints are investigated and how compliance with its requirements is monitored.

The Council also recommends stronger oversight of decisions to fund and acquire military-grade equipment. The approval process should include advance notice of proposed purchases, public disclosure of current inventories, meaningful consultation with affected campus communities, and a documented explanation of each item's purpose, cost, and necessity. UC should also provide consistent systemwide reporting on the approval, acquisition, and deployment of military equipment.

Surveillance, Privacy, and Information Collection

Several reviewers raised concerns about body-worn cameras, drones, facial recognition, license plate readers, AI-enabled analytics, and police information gathering at protest events. They recommended clear limits on when these technologies may be used, what information may be collected, how long it may be retained, who may access it, and whether it may be shared with outside agencies or used in student disciplinary proceedings.

The Gold Book should also address searches of phones, computers, research materials, and other electronic information in a manner that protects constitutional and statutory privacy rights, academic freedom, research confidentiality, and academic integrity.

Mutual Aid, Outside Agencies, and Private Security

Reviewers requested stronger safeguards around the deployment of officers from other campuses and the involvement of outside law enforcement agencies. They asked who authorizes outside assistance, whether assisting officers must follow UC policies, how authority is divided between host and assisting agencies, and how arrests and uses of force are documented, reviewed, and reported.

Several reviewers also noted that the Gold Book does not adequately address contracted private security personnel. It should clarify their authority, training requirements, supervision, nondiscrimination obligations, and accountability when they operate alongside UCPD.

Equity, Disability, and Mental Health Response

The Council recommends greater attention to implicit and explicit bias, discrimination, cultural awareness, disability, neurodiversity, and mental health crises. Reviewers cautioned that conduct described as resistance may sometimes reflect disability, fear, confusion, trauma, or a behavioral health condition. The policies should strengthen relevant training requirements and provide for the involvement of mental health professionals and alternative response teams whenever appropriate. Several responses also encouraged more routine, non-enforcement interaction between UCPD officers and members of the campus

community.

Finally, the comments include numerous policy-specific questions, proposed edits, and technical corrections concerning arrests and warrants, building access, jurisdiction at off-campus UC properties, uniforms and identification, reporting procedures, mutual aid costs, and other matters. We encourage the Office of Community Safety to review and respond to these detailed recommendations as the th policies are revised.

Thank you for the opportunity to comment. We would appreciate a response explaining how the Senate's comments will be considered and addressed as you finalize the policies.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Palazoglu', with a stylized flourish at the end.

Ahmet Palazoglu
Chair, Academic Council

cc: Academic Council
Senate Division Executive Directors
Senate Executive Director Lin



DAVIS DIVISION OF THE ACADEMIC SENATE
ONE SHIELDS AVENUE
DAVIS, CALIFORNIA 95616-8502
(530) 752-2220
academicsenate.ucdavis.edu

July 8, 2026

Ahmet Palazoglu
Chair, Academic Council

RE: Proposed Revisions to Presidential Policy – Systemwide Policies Applying to University of California Police Department

Dear Ahmet,

The proposed revisions to Presidential Policy – Systemwide Policies Applying to University of California Police Department were forwarded to all standing committees of the Davis Division of the Academic Senate. Seven committees responded: Diversity, Equity and Inclusion (DEIC), Faculty Welfare (FWC), and the Faculty Executive Committees of the College of Agricultural and Environmental Sciences (CAES), the College of Biological Sciences (CBS), the College of Letters and Science (L&S), the School of Law (LAW), and the School of Medicine (SOM).

Committees express no objection to the proposed revisions. DEIC and CBS provide a few recommendations for consideration. DEIC suggests that UC Davis campus policy should adhere to the Principles of Community and encourages police officers to consistently apply their deescalation training in their interactions. DEIC adds that established training and community-focused practices should be appropriately followed in each instance given concerns regarding the use of excessive force. CBS recommends that police officers should walk around the campus and engage with the campus community more frequently, which may help cultivate an environment where everyone feels safe.

Finally, LAW, FWC, and SOM discuss items that may warrant further clarification. Regarding arrests, LAW wonders whether a separate policy on when arrests are justified, such as with a warrant or probable cause, exists. LAW suggests ensuring that such policies address the legality of relying on civil warrants (e.g., immigration warrants) to execute arrests. In addition, LAW asks whether policies related to arrests cover issues related to cell phones, computers, etc. in a manner tailored to the UC context, including attention to constitutional and statutory privacy rights, academic freedom, and academic integrity. More broadly, FWC notes that it is unclear how feedback received from the systemwide review will be incorporated, while SOM states that it is difficult to decipher what impact the proposed revisions will have on UC community members.

The Davis Division appreciates the opportunity to comment.

Sincerely,



Katheryn Niles Russ, Ph.D.
Chair, Davis Division of the Academic Senate
Professor of Economics
University of California, Davis

Enclosed: Davis Division Committee Responses

c: Monica Lin, Executive Director, Systemwide Academic Senate
 Michael LaBriola, Assistant Director, Systemwide Academic Senate
 Edwin M. Arevalo, Executive Director, Davis Division of the Academic Senate
 Daniel Potter, Chair-Elect, Davis Division of the Academic Senate

June 17, 2026

Katheryn Russ

Chair, Davis Division of the Academic Senate

RE: Request for Consultation – Proposed Revisions to Presidential Policy - Systemwide Policies Applying to University of California Police Department

Dear Katheryn,

The Committee on Diversity, Equity, and Inclusion has reviewed the RFC regarding the Proposed Revisions to Presidential Policy - Systemwide Policies Applying to University of California Police Department and believes that the campus police should adhere to the principles of community. Officers are trained to prioritize de-escalation and should consistently apply this training in their interactions. There are concerns regarding the use of excessive force, which raises questions about whether established training and community-focused practices are appropriately followed in each instance.



Francisco Javier Aruaga

Chair, Committee on Diversity, Equity and Inclusion

c: Edwin M. Arevalo, Executive Director, Davis Division of the Academic Senate

June 11, 2026

Katheryn Russ

Chair, Davis Division of the Academic Senate

RE: Request for Consultation – Proposed Revisions to Presidential Policy - Systemwide Policies Applying to University of California Police Department

Dear Chair Russ:

The Committee on Faculty Welfare has reviewed the RFC – Systemwide Policies Applying to University of California Police Department. We note that there is a very short timeline for input on such a serious project, and it has not yet been made clear to us whether and how upstream administrators might integrate our comments. We also are aware that UCFW has undertaken very deliberate review of the entire proposed updates to the Gold Book. As such, our committee feels the need to defer to UCFW and does not intend to provide additional review.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Foley', with a stylized, cursive script.

Janet Foley

Chair, Committee on Faculty Welfare

Proposed Revisions to Presidential Policy - Systemwide Policies Applying to University of California Police Department

FEC: College of Biological Sciences Committee Response

June 12, 2026

The CBS FEC and faculty have reviewed the Proposed Revisions to Presidential Policy - Systemwide Policies Applying to University of California Police Department and in discussions, many faculty recommended that the police should walk around the campus and engage with the community more to create an environment where everyone feels safe.

Proposed Revisions to Presidential Policy - Systemwide Policies Applying to University of California Police Department

FEC: School of Law Committee Response

June 12, 2026

The law school FEC received these thoughtful comments/questions:

The policy on arrests focuses on execution but not justification for the arrest. Should I assume there is a separate policy on when arrests are justified – e.g., with a warrant and probable cause. I am especially interested in ensuring that these policies address the legality/illegality of relying on civil warrants (like immigration warrants) to effectuate arrests. The arrest policy also mentions a separate policy on searches pursuant to arrests. It was not included, assuming because it was not amended. I would love to understand whether this policy also specifies issues around cell phones, computers, etc., that is also tailored to the university and safeguards, in addition to privacy rights under the 4th amendment, statutory privacy matters and academic freedom or academic integrity (e.g., arrest in a lab, etc.)

Proposed Revisions to Presidential Policy - Systemwide Policies Applying to University of California Police Department

FEC: School of Medicine Committee Response

June 12, 2026

SOM FEC comments regarding these changes are:

1. It is difficult to decipher what the changes are going to mean for the UC faculty, staff, and students.
2. None of the changes from university-specific to system-wide were strikingly different.
3. The university documents have dates listed where as the system-wide documents are currently only dated with a reference year. Will dates be added?

June 5, 2026

Ahmet Palazoglu
Chair, Academic Council

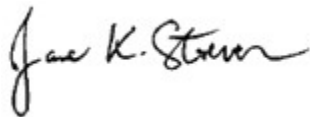
Re: Systemwide Policies Applying to University of California Police Department

At its meeting on June 2, 2026, the Irvine Division Cabinet discussed the proposed revised Systemwide Policies Applying to the University of California Police Department (UCPD). The Council on Faculty Welfare, Diversity, and Academic Freedom (CFW), the Council on Teaching, Learning, and Student Experience (CTLSE), and the Council on Equity and Inclusion (CEI) also reviewed the policies. The councils' feedback is attached for your review.

Cabinet members shared the councils' comments and concerns about policies for the use of deadly force as well as the use of "boilerplate" language around policing and arrests that seemed applicable to any community rather than specific to the campus community. Some members also questioned whether those policies relevant to police response to demonstrations and protest management are consistent with the recommendations made in the [Robinson-Edley Report](#).

The Irvine Division appreciates the opportunity to comment.

Sincerely,



Jane Stoever, Chair
Academic Senate, Irvine Division

Cc: Lisa Grant Ludwig, Chair Elect-Secretary
Jisoo Kim, Executive Director
Gina Anzivino, Associate Director

May 18, 2026

Jane Stoever, Chair
Academic Senate, Irvine Division

Re: Review of Systemwide Policies Applying to University of California Police Department

The Council on Equity and Inclusion (CEI) reviewed the Systemwide Policies Applying to University of California Police Department, at its meeting on May 4, 2026.

Members raised the following implementation and communication concerns:

1. In 1311.3.1 ALTERNATIVE TACTICS - DE-ESCALATION, members would prefer that “Consider and utilize” be a consistent phrase. The section should also define more tactics beyond ‘making a plan’.
2. In the 1313.00 BIAS-BASED POLICING, under the Policy Summary section, members recommend the adoption of the underlined text to parallel references of existing training related to Inclusivity and Equity in other areas of the document that should also be mentioned again in this section:
 - o “The policy requires mandatory reporting to the California Department of Justice, annual internal reviews, and regular training on implicit and explicit bias, mental health awareness, Anti-discrimination awareness, inclusivity awareness, cultural awareness, and avoiding profiling. All complaints of bias-based policing activities will be investigated.”
3. Members supported the development of a state-level Incident Command Center and outlining a chain of communication, but it remains unclear who has the final decision authority?
4. Members wanted to know who makes the decision determining between lawful and unlawful behavior for arrests?
5. Members were happy to see “protecting lawful behavior” was listed more prominently and elevated in several sections.

The council appreciates the opportunity to comment.

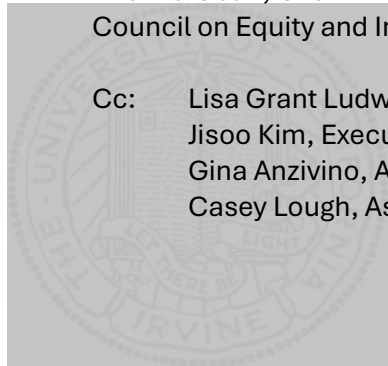
If you have any questions, please do not hesitate to reach out to me.

Sincerely,



Kristina Uban, Chair
Council on Equity and Inclusion

Cc: Lisa Grant Ludwig, Chair Elect-Secretary
Jisoo Kim, Executive Director
Gina Anzivino, Associate Director
Casey Lough, Assistant Director & CEI Analyst



May 14, 2026

**JANE STOEVER, CHAIR
ACADEMIC SENATE – IRVINE DIVISION****Re: Review of Systemwide Policies Applying to University of California Police
Department**

The systemwide Senate distributed for review the proposed revised Systemwide Policies Applying to the University of California Police Department (UCPD). The Universitywide Police Policies and Administrative Procedures (“Gold Book”) was last comprehensively revised in 2010. The current update reflects changes in law, policing standards, best practices, and community expectations, and supports compliance with International Association of Campus Law Enforcement Administrators accreditation standards, which require campus law enforcement agencies to maintain current, clearly articulated, and regularly reviewed policies. The Council on Faculty Welfare, Diversity, and Academic Freedom (CFW) discussed this issue at its meeting on May 12, 2026, and submits the following comments:

1. Members found it unusual that PSAC’s aren’t involved in these reviews.
2. Members expressed concern regarding the long-range acoustic devices. They can make public announcements, but they also have a deterrent mode that is very loud and can cause hearing loss. It is unclear if UC has a specific policy on use and decibels.
3. The language regarding “arrests” seemed very boilerplate and not college and UC-specific.
4. Members questioned the timing of the revisions to these policies, and whether they were made in response to campus encampments in 2024.
5. Members expressed concern regarding use of military equipment, specifically in section 1320.5.2, which states:
 - (a) The governing body shall only approve a military equipment use policy if it determines all of the following: (Government Code § 7071(d) (1)) 1.
Necessary because there is no reasonable alternative that can achieve the same objective of officer and civilian safety.

What is a “reasonable alternative” and how is that determined? Members questioned the rationale for using military equipment at all.

Sincerely,



Ben Lourie, Chair
Council on Faculty Welfare, Diversity, and Academic Freedom

May 14, 2026

JANE STOEVER, CHAIR
ACADEMIC SENATE – IRVINE DIVISION

Re: Review of Systemwide Policies Applying to University of California Police Department

The systemwide Senate distributed for review the proposed revised Systemwide Policies Applying to the University of California Police Department (UCPD). The Universitywide Police Policies and Administrative Procedures (“Gold Book”) was last comprehensively revised in 2010. The current update reflects changes in law, policing standards, best practices, and community expectations, and supports compliance with International Association of Campus Law Enforcement Administrators accreditation standards, which require campus law enforcement agencies to maintain current, clearly articulated, and regularly reviewed policies.

The Council on Teaching, Learning, and Student Experience (CTLSE) discussed this issue electronically and at its meeting on May 4, 2026. Overall, members agreed that these revisions and updates seemed thorough and appropriate. However, members also had the following comments and recommendations:

1. Each policy ends with a statement regarding compliance and responsibilities:
Each Chief of Police has the responsibility to adopt and publish policies and procedures for the assistance and guidance of the members of their individual campus police departments. Policies and Procedures for campus police departments issued by authority of the Chief of Police shall have the same authority as these Policies.
Given that policies originating from the Chief of Police have the same authority as those going through systemwide review, is there any sort of oversight?
2. Section 1309.2.2.5 states that commemorative badges and special awareness patches can be worn for short periods of time (1 year and 1 month respectively) if authorized by the Chief of Police. What are the criteria for which patches and for which time periods? Are certain topics considered inappropriate?
3. Section 1311.4 states:
An officer may use deadly force to apprehend a fleeing person for any felony that threatened or resulted in death or serious bodily injury if the officer reasonably believes that the person will cause death or serious bodily injury to another unless immediately apprehended.
It seems problematic to apprehend a suspect by killing them. While the use of deadly force may later be deemed necessary and, therefore, appropriate, perhaps language encouraging the use of non-lethal force should be added.
4. Section 1311.5 states:
Any Use of Force during a University of California Campus Mutual Aid or Systemwide Response Team (SRT) event shall be reported and documented by the host campus. The host campus will notify the involved officer’s Chief of Police

as soon as practicable and provide all reports for management review. The host campus will report the use of force incident to UCOP as part of the Community Safety Plan and the involved officer's department will be responsible for any POST or DOJ mandated reporting.

Is the campus community ever informed of these reports?

5. Section 1318 states that "Arrests are generally handled by host campus officers, and after each deployment, a written report documents the assistance provided." Was this the standard practice prior to these revisions? Members expressed concern that this practice was not followed during the mutual aid event that included arrests at UCI in May 2024.
6. Some minor issues include the following:
 - a) Typo on bottom of p.24 (13.04.102): "Systemwide Police Polices" should be "Systemwide Police Policies."
 - b) p. 27, Table of Contents IV: "Error! Bookmark not Defined"
 - c) Policy 1306.00 incorrectly has "1318 – Systemwide Mutual Aid" on the top of every page.

Sincerely,

Mary McThomas

Mary McThomas, Chair
Council on Teaching, Learning, and Student Experience

CC:

Julie Kennedy, CTLSE Analyst
Academic Senate

Jisoo Kim, Executive Director
Academic Senate

Gina Anzivino, Associate Director
Academic Senate

Casey Lough, Assistant Director
Academic Senate



June 4, 2026

Ahmet Palazoglu
Chair, UC Systemwide Academic Senate

Re: (Systemwide Senate Review) Proposed Presidential Policy - Systemwide Policies Applying to University of California Police Department (UCPD)

Dear Chair Palazoglu,

The UCLA divisional Executive Board (EB) reviewed the Proposed Systemwide Policies Applying to UCPD and the committee/council feedback at their meeting on June 4, 2026.

EB members agreed to share the enclosed feedback from the divisional councils and committees for systemwide consideration. Members concurred with the points made in the attached letter from the Committee on Rules and encouraged a particularly close review of their advice.

Members expressed strong exception to the fact that the Academic Senate was provided a brief period at the end of the academic year to review crucial and dense documents. They did not see a good faith effort by Administration to respect the consultation process critical to shared governance.

Thank you for an opportunity to advise on this issue.

Sincerely,



Megan McEvoy
Chair, UCLA Academic Senate

Encl.

Cc: Kathy Bawn, Immediate Past Chair, UCLA Academic Senate
April de Stefano, Executive Director, UCLA Academic Senate
Tim Groeling, Vice Chair/Chair Elect, UCLA Academic Senate



Response to Proposed Revisions to Universitywide Police Policies and Administrative Procedures

Submitted by the SE&IS FEC
June 3, 2026

The Faculty Executive Committee of the School of Education and Information Studies has reviewed the proposed revisions to the Universitywide Police Policies and Administrative Procedures, commonly known as the “Gold Book.” Our task is to assess the proposed policing revisions within the context of broadening security operations at the University of California, and to determine whether the framework they establish is adequate to safeguard civil liberties, academic freedom, expressive activity, and public trust within a university community.

There is substantial convergence across recognized authorities on what policing in a university setting should look like. The Final Report of the President’s Task Force on 21st Century Policing (2015), the Robinson/Edley report to UC (2012), and the systemwide Public Safety Task Force convened by the Academic Senate (2018) consistently emphasize the sanctity of human life as the organizing purpose of use-of-force policy, a graduated “force continuum” with a default toward de-escalation and the least intrusive available means, precise and narrowly drawn definitions of conduct that may justify force, and independent, community-based oversight. The American Association of University Professors and the UC Principles of Community further underscore that policy governing a campus must protect rather than chill teaching, research, and protected expression. Taken together, these sources caution against importing municipal enforcement language into a university environment without tailoring it to the distinctive obligations of a public research institution.

The SE&IS FEC finds that the existing policies and the proposed revisions, taken together, **raise serious First Amendment and civil-liberties concerns**. The framework’s orientation is predominantly toward the constraint of expressive activity rather than its enablement. That orientation is in tension with the mission of a university, whose distinctive obligation is to sustain the conditions for inquiry and protected speech. The committee does not assert a legal conclusion as to any particular provision; it identifies a pattern that warrants careful review against the University’s constitutional and academic obligations.

When evaluated against these standards, the proposed revisions appear **out of step with widely recognized norms for the governance of campus policing**, and they are difficult to review on their own terms. The document provides little justification for the changes it introduces, and its formatting impedes comparison against the policy it would replace, leaving the committee unable to determine why particular provisions are added, removed, or rewritten.



More substantively, **the proposal does not appear to engage the principal concerns identified by the 2018 systemwide Public Safety Task Force.** That body recommended specific guardrails on the use of force, including a sanctity-of-life purpose, a force continuum, and clearer thresholds for when force may be used. It likewise sets aside two structural matters the task force treated as central: what it means for the University to maintain a police force, and the role of that force in building rather than policing a campus community; and the establishment of independent Police Advisory Boards composed of faculty, staff, students, and other stakeholders. The omission of independent oversight is particularly significant because, as the task force observed, UCPD answers to unelected administrators rather than to elected officials and therefore has fewer structural channels for community accountability.

The committee notes a related deficiency as its own item. The proposal **repeatedly permits local departments to design their own protocols** so long as those protocols are “more restrictively” written than the systemwide policy. The 2018 task force already flagged this language as loose and urged a formal systemwide mechanism to review local regulations for compliance. As written, the “more restrictive” formulation does little to clarify how community safety and civil rights are to be protected, and it permits material variation across campuses on precisely the issues—use of force, crowd control, and weapons—on which the task force urged systemwide consistency.

The committee is concerned that the definitions governing resistance and noncompliance, together with the rewritten chapter on the use of force, **create conditions under which officers may apply force against individuals engaged in deliberate nonviolence.** The definitions of “active resistance” and of nonverbal and verbal noncompliance are ambiguous, giving officers broad discretion to classify a subject in a manner that authorizes escalated force. Of particular concern is the operative provision stating that “nothing in this policy requires an officer to ... retreat ... before applying reasonable ... force.” This formulation inverts the least-intrusive-means default that the 2018 task force found essential. This concern is not hypothetical at the University of California: in November 2011, a UC Davis police officer pepper-sprayed nonviolent student protesters at close range, an episode that drew national condemnation and prompted a critical independent review chaired by former California Supreme Court Justice Cruz Reynoso.

The committee has specific concerns about the proposal's **limited engagement with surveillance technology**, an omission that is consequential in the era of body-worn cameras and associated recording systems. The 2018 task force devoted sustained attention to body cameras, warning against a policy that prioritizes officer interests over community access. The committee understands that police-camera footage has been used in student-disciplinary proceedings at UCLA; if so, the governance of such footage, including its retention and access, bears directly on the well-being of our students.

The proposal **does not provide a clear account of when less-than-lethal munitions may be used.** The committee notes this with particular concern in light of reports that the University continues to authorize munitions reportedly banned by the Los Angeles Police Department. The 2018 task force recommended a single systemwide list of approved devices, subject to regular medical review, with campuses free to decline but not to add devices at local discretion. The current proposal's reliance on local discretion is inconsistent with that recommendation.



Although sworn officers are prohibited from discriminatory expression, the proposal does not make clear how that prohibition applies to contracted private security and is silent on the increasingly common use of such personnel -- a significant gap, given that they may operate alongside UCPD without the same constraints.

These concerns are compounded by the proposal's governance structure. **Authority is concentrated within the police hierarchy**, with limited articulation of independent or shared-governance review. Substantive matters are displaced either to local discretion or to documents outside the policy itself, allowing significant changes to occur without systemwide review. Taken together, these features **fall short of the transparency, stability, and faculty-inclusive oversight** emphasized across the authorities cited above.

Recommendations

1. Align the revised Gold Book with established public-safety best practices and prior UC review.

The revised policy should reflect the recommendations of the 2015 President's Task Force on 21st Century Policing, the 2012 Robinson/Edley report, and the 2018 systemwide Public Safety Task Force, as well as AAUP guidance and the UC Principles of Community. Concretely, it should adopt a sanctity-of-life purpose; establish a documented force continuum with an explicit least-intrusive-means default; define resistance, noncompliance, and "intent to be violent" narrowly and precisely, including a defined category of passive resistance; establish a single systemwide list of approved less-than-lethal devices subject to regular medical review; and impose strict limits on the retention, access, and use of body-camera and other recordings, including a prohibition on their use in student-conduct proceedings absent defined safeguards.

2. Establish and empower independent Police Advisory Boards at the campus and systemwide levels.

Consistent with the 2018 task force, each campus should convene an independent Police Advisory Board, and the University should establish a systemwide board, with membership representative of the campus community and faculty members recommended by the Academic Senate in the spirit of shared governance. These boards should have the capacity to receive and review complaints independently, to review investigations and disciplinary outcomes, and to access underlying data rather than summary statistics alone.

Conclusion

The SE&IS FEC recognizes that a campus police force, properly governed, serves legitimate public-safety functions. It also recognizes that the authority to use force, to deploy weapons, and to conduct surveillance exists in inherent tension with constitutionally protected rights and with the conditions of a university. As a public university in California, the University's policing policies should meet the highest standards of transparency, accountability, constitutional protection, and community-based oversight. A revision that enlarges enforcement discretion over force, munitions, and surveillance must also be balanced by corresponding protections and oversight consistent with the mission of a public research university and with the UC Principles of Community.



Thank you for the opportunity to share these comments.

For questions and/or additional information, please contact:

Teresa L. McCarty, 2025-2026 SE&IS Chair

Distinguished Professor and G.F. Kneller Chair in Education and Anthropology

Faculty, American Indian Studies

Teresa.McCarty@ucla.edu

To: Megan McEvoy, Chair, UCLA Academic Senate

From: Martie Haselton, Chair, Committee on Academic Freedom

Date: June 1, 2026

Re: (Systemwide Senate Review) Proposed Presidential Policy - Systemwide Policies Applying to University of California Police Department

The Committee on Academic Freedom (CAF) discussed the proposed revisions to Presidential Policy - Systemwide Policies Applying to University of California Police Department (UCPD) at its meeting on May 15, 2026. Members commented that many of the policies would benefit from concrete examples to help illustrate the information in the policy. For example, the policy on “Use of Force” denotes that police may use discretion for determining whether use of force is necessary. The policy’s benchmark for necessity is based on a legal standard for what is “objectively reasonable” for the officer. The policy cites the legal standard more broadly, but would be clearer if it included additional examples that illustrate what may be “objectively reasonable” for an officer, including examples from case law.

Members expressed concerns about the significant discretion that police may have to gather information during first amendment gatherings, and queried what guardrails there are on officers collecting information and what protections there are for freedom of speech? It appears that police had wide latitude once they determine there is a safety concern, however the policy does not clearly define how safety is determined. Members also raised concerns about whether and how the university police appropriately consult with faculty members when responding to crisis situations or to those that may require use of force or informational gathering. In addition to working with the Chancellor and UC Legal, members suggest that UCPD develop mechanisms for faculty consultation.

cc: Kathy Bawn, Immediate Past Chair, Academic Senate
April de Stefano, Executive Director, Academic Senate
Tim Groeling, Vice Chair, Academic Senate
Tara Hottman, Senior Policy Analyst, Academic Senate

May 28, 2026

To: Executive Board Members
c/o Megan McEvoy, Chair
Academic Senate

From: Vinay Lal, Chair
Committee on Charges

Re: Proposed Presidential Policy - Systemwide Policies Applying to University of California
Police Department (UCPD)

The Charges Committee has concerns that very little time was given to review this proposed policy. Although final comments are not due until July 2026, this does not take into consideration the [UC Policy Owner Guidebook](#) admonition “The Systemwide Comment Period is typically 90 days, with the majority of the comment period intended to take place during the academic year to allow sufficient time for the Academic Senate and other constituents to review the proposed Policy.” The letter requesting review was issued on April 24, 2026. Allowing for a few days for that request to be disseminated to campus Senates, this leaves roughly a 30-45 day comment period during the academic year (depending on whether the campus is on the quarter or semester system). It is unclear whether this is an entirely new policy or a substantive revision of prior policies. Either way, the policy should undergo the “entire Presidential Policy process.” The Charges Committee also has concerns that, other than citing a lapse of time since the last major revision, no rationale is given for this extensive revision /new policy.

In the limited review period, the Committee had these comments:

- Members appreciate that Academic Senate Leadership is cited as a stakeholder in Crowd and Demonstration Management and trusts this will be practiced proactively on campuses: “UCPD shall embrace collaboration with stakeholders when planning for and responding to public assemblies and gatherings.”

cc: April de Stefano, Academic Senate Executive Director
/mmo

To: Megan McEvoy, Chair, Academic Senate

From: Jennifer Wagman, Chair, Committee on Rules and Jurisdiction

Date: May 28, 2026

Re: (Systemwide Senate Review) Proposed Presidential Policy - Systemwide Policies Applying to University of California Police Department (UCPD)

At its meeting on May 27, 2026, the Committee on Rules and Jurisdiction (CR&J) discussed the Systemwide Senate Review of Proposed Presidential Policy - Systemwide Policies Applying to University of California Police Department (UCPD). Members offered the following comments:

- CR&J's previous [2024 Request for Consideration of Issues Related to Recent Campus Protests](#) and [2024 UCLA Time, Place, and Manner Policies](#) memos document that the current policing status quo is problematic and that the proposed changes are regressive.
- The current policies and the proposed changes effectively restrict the exercise of First Amendment rights. The thrust is almost entirely on their constraint, not their enablement – the antithesis of the meaning of a university.
- The proposed policies do not appear to engage with many of the concerns identified and recommendations suggested by the [2018 Report of the Systemwide Public Safety Task Force initiated by the University Committee on Faculty Welfare \(UCFW\)](#). Most critically, recommended guardrails for force and changes to the definition of when force may be used are not discussed; discussion of what it means for UC to be a campus police force and the role of UCPD in building campus community is ignored; and the role of Police Advisory Boards constructed of faculty and other stakeholders is ignored.
- This task force recommended clarity around what stipulations are placed on local UCPDs. These proposed policies repeatedly state that UCPDs can design their own protocol so long as they are “more restrictive” without stipulations. This language is not helpful in thinking about protecting community safety and community civil rights.
- There is little to no justification provided for these changes. The formatting of the proposed policies are confusing and prevents straightforward review; while the policies provided track-changes, many were completely re-written, making it difficult to review the changes.
- Concerns were raised over the sections on surveillance, in particular, the lack of discussion of new surveillance technology. This feels particularly important in the era of body cameras, and given that UCLA has been using police footage in disciplinary hearings.
- There is no clear discussion of when to use less-than-lethal munitions, notable given that [UCLA Police Department has the largest less-than-lethal munitions stockpile of any UC](#), and that the [UCPD has not banned munitions that have been banned by LAPD](#).
- It is not clear how any of these policies relate to the increasingly common usage of hired private security. For example, though UCPD is banned from engaging in discriminatory language, it is not clear how this interacts with hired private security.

- The definitions of resistance and noncompliance create situations where the UCPD is allowed to use force against individuals intentionally engaging in nonviolence. Notably language in the policy on force notes “nothing in this policy requires an officer to retreat... before applying reasonable and necessary force.”

Thank you for the opportunity to review and comment. If you have any questions, please do not hesitate to contact me at jennwagman@ucla.edu or via the Committee’s analyst, Lori Ishimaru, at lishimaru@senate.ucla.edu.

cc: April de Stefano, Executive Director, Academic Senate
Lori Ishimaru, Principal Policy Analyst, Academic Senate
Members of the Committee on Rules and Jurisdiction

May 28, 2026

To: Megan McEvoy
Chair, Academic Senate

From: Richard Desjardins
Chair, Council on Planning and Budget

Re: Systemwide Senate Review, Proposed Presidential Policy - Systemwide Policies Applying to University of California Police Department (UCPD)

At its meeting on May 4, 2026, the Council on Planning and Budget (CPB) discussed the proposed presidential policy - Systemwide Policies Applying to University of California Police Department (UCPD). Members offered the following comments.

CPB Members observed that UCLA's size and its role in both hosting officers and sending officers to other campuses may create cost imbalances across the UC system, and that the proposed policy does not address how these costs are shared or whether the current model places disproportionate burdens on certain campuses. Finally, members noted that the proposed policy touches on broader administrative cost structures without fully acknowledging them. Members suggested that a more explicit discussion of these underlying costs would strengthen the policy and support a more informed evaluation of its long-term implications.

If you have any questions, please do not hesitate to contact me at desjardins@ucla.edu, or via the Council's analyst, Elizabeth Feller, at efeller@senate.ucla.edu.

cc: Kathleen Bawn, Immediate Past Chair, Academic Senate
Tim Groeling, Vice Chair/Chair Elect, Academic Senate
April de Stefano, Executive Director, Academic Senate
Elizabeth Feller, Associate Director, Academic Senate
Members of the Council on Planning and Budget

May 28, 2026

To: Megan McEvoy, Chair, Academic Senate

From: Elizabeth Rose Mayeda, Chair, Faculty Welfare Committee

Re: **Systemwide Senate Review Proposed Presidential Policy-Systemwide Policies Applying to University of California Police Department (UCPD)**

At its meeting on May 5, 2026, the Faculty Welfare Committee (FWC) reviewed the Proposed Presidential Policy-Systemwide Policies Applying to University of California Police Department (UCPD). Members offer the following comments and recommendations.

From the perspective of FWC, the UCPD Gold Book policies were very dense. Members reviewed the Gold Book with an eye toward how the policies support and protect faculty and the broader campus community.

Use of Force

Members expressed concern about UCPD conducting its own internal analysis and review of use-of-force incidents. There should be an independent, unbiased external review process. Academic departments are generally not permitted to evaluate themselves without outside oversight, and the same principle should apply here.

Crowd and Demonstration

Members identified a need for clarification regarding authority and faculty responsibilities during protests or demonstrations. Specifically, it would be helpful to have clear guidance for situations in which a demonstration occurs inside a classroom during instruction or within an academic building while faculty are present and working, including who has authority in those situations and what faculty are expected to do. Clear guidance on these issues would help faculty better understand how to appropriately engage with UCPD during demonstrations or disruptions.

Jurisdiction at Off-Campus UCLA Properties

Members also raised concerns about safety jurisdiction at UCLA properties not on the main campus. For example, UCLA Downtown campus locations, UCLA Health clinics, UCLA Housing, and other UCLA-owned or affiliated properties. It was unclear whether jurisdiction over these locations falls to local law enforcement or UCPD and who faculty and staff should contact first during an emergency. Members also seek additional clarity regarding interactions with security guards at non-campus UCLA sites and UCPD involvement and authority at those locations.

Building Access and Screening

Members expressed concern and raised questions about building access and screening policies, specifically which buildings require screening, how those determinations are made, and how the university balances campus accessibility with safety and security considerations.

Time, Place, and Manner (TPM) Policies

Members noted that there is no clear mention of TPM policies and feel it would be helpful for the Gold Book to explicitly state that UCPD is expected to comply with TPM standards and enforcement guidelines.

The FWC appreciates the opportunity to provide input on the UCPD Gold Book policies and wishes to clarify that the questions raised are not intended to advocate for increased security measures, but rather to seek greater transparency and understanding of UCPD policies.

If you have questions, please do not hesitate to contact me at mayedag@ucla.edu or the analyst, Renee Rouzan-Kay, at rrouzankay@senate.ucla.edu.

CC: Tim Groeling, Vice Chair/Chair-Elect, Academic Senate
Kathleen Bawn, Immediate Past Chair, Academic Senate
April de Stefano, Executive Director, Academic Senate
Renee Rouzan-Kay, Senior Policy Analyst, Academic Senate
Members of the Faculty Welfare Committee

UCLA MEMORANDUM

FACULTY EXECUTIVE COMMITTEE
College of Letters and Science

A265 Murphy Hall
Box 951571
Los Angeles, California 90095

To: Megan McEvoy, Chair, Academic Senate, UCLA

Fr: Erin Debenport, Chair, College Faculty Executive Committee

Date: May 28, 2026

Re: **Response to the Systemwide Senate Review Proposed Presidential Policy- Systemwide Policies Applying to University of California Police Department (UCPD)**

The College Faculty Executive Committee (FEC) at UCLA appreciates the opportunity to comment on the (Systemwide Senate Review) Proposed Presidential Policy- Systemwide Policies Applying to University of California Police Department (UCPD). After a review of the recommendations, we offer the following comments.

Context

The College FEC recognizes the need for a comprehensive and transparent UCPD policy. However, we cannot meaningfully review this proposal because there is no context to explain the rationale behind these changes and additions. Without this background information, we are left to guess what specific issues, mandates, or past incidents may have prompted these changes or why certain existing protocols were left as is.

To review these updates effectively, we need to understand the decision-making process. How were options weighed when deciding what to include or not? Were these updates made in response to the events of Spring 2024? Reviewers need to know and understand if and how events spurred revisions, especially in policies related to the use of force and campus intervention. Without a clear rationale, the FEC is left to speculate whether these updates are proactive policy improvements or reactive measures to recent campus unrest.

Logistical and Formatting Deficiencies

The way this proposed policy is presented is disorganized and convoluted, making a straightforward review almost impossible. The document seems to be organized by putting revised items (denoted by the track changes) first, followed by the clean versions. However, this is misleading as several of these clean versions are actually entirely new policies. Further compounding this lack of clarity is the confusing language used under the “updates” sections. For example:

- January 2, 2026: **Original issuance.** Updated This Policy is also reformatted to meet Web Content Accessibility Guidelines (WCAG) 2.0
- January 2, 2026: **Original systemwide policy.** This Policy is also reformatted to meet Web Content Accessibility Guidelines (WCAG) 2.0 January 7, 2011: Revised
- January 2, 2026: **New policy to comply with law,** approved in Sept 2022 by Regents. This Policy is also reformatted to meet Web Content Accessibility Guidelines (WCAG) 2.0 January 7, 2011: Revised
- January 7, 2011: January 2, 2026: **New.** This Policy is also reformatted to meet Web Content Accessibility Guidelines (WCAG) 2.0 VI. Revised January 7, 2011

In those examples listed above, it is unclear if the policies labeled **original systemwide policy** or **original Issuance** are new, as denoted by their date, or updated versions, which do not align with their date. Either way, any new policies should be clearly flagged for a review of this type. Furthermore, the policy numbers were listed out of order, making the document harder to navigate.

Substantive Content Concerns

Beyond the formatting issues, committee members expressed concern regarding multiple content areas that directly impact campus safety, civil liberties, and university governance.

First, it is unclear if *Policy 1321.00 Unmanned Aircraft Systems* is a new policy or not. It is labeled as an original systemwide policy, dated January 2, 2026, with a reference to a 2011 revision date. However, it is not indicated to be new or updated. Given technological advancements over the past 15 years, one would expect this to have been updated, unless it was a new addition. This section needs to be updated as there are typos in section 1321.8 with the list repeating letters c, d, and j.

The committee is particularly concerned with the surveillance loopholes:

1. There is significant concern that the policy lacks definitions and protocols for modern drone features, such as facial recognition integration, AI analytics, license plate readers, etc. The policy states that drones will not be used “to monitor gatherings, marches or protests where criminal activity is not reasonably likely unless approved by the chancellor or designee.” This exception is too broad. Following the Spring 2024 campus protests, administrators were quick to label peaceful actions as code violations. As written, this loophole would allow immediate drone surveillance on peaceful activity. The policy needs to define exactly what constitutes criminal activity to ensure that it can't be used against protected speech or student advocacy.
2. Section 1321.8 allows for “Mutual aid support and outside law enforcement assists when the underlying missions meet the uses outlined in this policy.” As written, this allows requests from outside entities, such as LAPD, for drone surveillance on or near the campus.
3. There is no information including data ownership within the policy. The 180-day retention window for non-criminal footage is an intrusion on privacy. Non-relevant data should be deleted within a much shorter, and specified, timeframe

The committee also questions the focus of *Policy 1318 Systemwide UCPD Mutual Aid*. This policy reads more like a transactional agreement than a safety protocol. Given the scrutiny surrounding systemwide police coordination during Spring 2024, it is alarming that this policy was not revised in a meaningful way. Section 1318.02 did not make any updates to include notifications or approval processes between the campus Chief of Policy and Chancellor, campus leadership, or faculty senate. By failing to include this information, the policy bypasses university governance and leaves the campus without checks and balances during times of crisis.

The committee also has concern around the lack of less-lethal weapon protocols within the policies. Despite intense campus and national scrutiny over policy tactics, the proposal reads as if the events of 2024 at UCLA never happened. There do not appear to be any lessons learned from those events, even ignoring critical data on the risks of such weapons. A Daily Bruin [article](#) revealed that the UCLA Police Department holds the largest stock of less-lethal munitions of any UC campus. There is no explanation as to why specific guidelines around less-lethal munitions were left out. Instead of establishing rigorous, data-driven boundaries on when weapons or munitions can be used, the language is vague and transactional, leaving students and faculty exposed to administrative overreach and ultimately failing to ensure the physical safety of those on campus.

Clarification

In light of these concerns as outlined above, the committee requests a clear and organized version of the proposed policy changes so a thorough review may be done. This should include a comprehensive list of new policies, a summary of substantive changes versus clerical edits and updates, and a clear explanation of the impetus behind all major changes. In addition, the document needs information about what events, mandates, or policies led to these changes.

As always, our membership appreciates the consultative process and welcomes the opportunity to participate in the discussion of important matters like this. You are welcome to contact us with questions.

The College Faculty Executive Committee

To: Megan McEvoy, Chair, UCLA Academic Senate

From: Raphael Rouquier, Chair, Committee on Diversity, Equity & Inclusion

Date: May 28, 2026

Re: (Systemwide Senate Review) Proposed Presidential Policy – Systemwide Policies Applying to University of California Police Department (UCPD)

At its meeting on May 5, 2026, the Committee on Diversity, Equity, and Inclusion (CODEI) discussed the Proposed Presidential Policy – Systemwide Policies Applying to University of California Police Department (UCPD). Members appreciated that the policies were last updated in 2010 and thus updates were needed to align the policies with new laws, standards and community expectations. However, they expressed serious concerns about several of the policies which appear to conflict with recent research about best practices in policing and have the potential to harm UCLA and UC community members. Members shared their comments on specific policies below.

Use of Force

Members shared several concerns regarding the use of force policies and the factors listed in the policy that determine “whether to apply force and evaluating whether an officer has used reasonable force” (pg. 9). Members were concerned that policies focus only briefly on de-escalation strategies and alternative tactics and that the policy does not specify any circumstances in which de-escalation strategies and alternative tactics are required, as opposed to encouraged.

Policies 1311 (“Use of Force”) and 1316 (“Crowd and Demonstration Management”) define actions like tensing or bracing for impact as “active resistance”, which it justifies as warranting a higher use of force. In 1311, the policy states that “physically evasive movements ... including but not limited to bracing, tensing, running away, or verbally or physically signaling an intention to” escape (p. 4). In 1316, the policy refers to “bracing, tensed muscles, interlock arms/legs, pushing, kicking, etc.” as active resistance (p. 20). This definition of “active resistance” appears to discriminate against neuroatypical UC community members, or those who have been victims of violence and could respond in this manner. Policy 1311 also explicitly permits “pain compliance techniques,” which appear to be another form of use of force (p. 11).

Given that there is an existing body of research (e.g. [Shjarback & Ward 2025](#)) that correlates broad, use of force policies like those in 1311.3 with more police shootings and therefore more racially discriminate police violence, members contend that the UC should consider adopting clear and tested guidelines and use of force policies that are intended to reduce police violence (see [Sinyanwe 2016](#)). Further, members agreed that UC policies should include the *requirement* that police de-escalate, not just the *encouragement* that they do so. Members are concerned that broad and vague guidelines like those in the use of force section have the potential to increase police violence on campus, a situation that members very much do not want to see, especially after the violence experienced during Spring 2024.

Crowd and Demonstration Management

The policy on Crowd and Demonstration Management (1316) states “that the terms “boisterous” and “tumultuous” as written in Penal Code §407 have been interpreted as conduct that poses a clear and present danger of imminent violence” (p. 16) This definition suggests that noisiness is evidence of imminent violence, and it appears the policy runs the risk of violating the free speech rights of UC community members.

The policy also permits “plain-clothes resources” for crowd management. Members were concerned about police not being visible or identifiable and expressed concerns that police would not be in uniform at all times when in their area of jurisdiction. This seems particularly important for the safety of UC community members of color in the context of the illegal actions of federal immigration agents.

Weapons

Similarly, members argued that there is no reason to allow UCPD to carry concealed weapons, which is explicitly prohibited by Policies 1309 and 1322, and members feel there is no reason UCPD need military-grade weapons. Members were concerned that Policy 1316 (Crowd and Demonstration Management) permits the use of “chemical agents against passive resisters” in “exigent circumstances” and permits training in (and use of) “less-lethal kinetic energy munitions” (p. 10). Given the UCPD [arsenal as of 2025](#) and purchases this year which amounted to more than \$8,000 of military equipment, members contend that UCLA and other campuses should not be spending additional funds to purchase weapons or drones.

Mutual Aid

Policy 1318 (Systemwide UCPD Mutual Aid) allows and encourages external mutual aid, including sending non-UC officers like the Los Angeles Police Department or the California Highway Patrol to a UC campus. Because LAPD has [a history of very consequential racial discrimination](#), this policy seems like it may create an existential problem for students and community members of color. External agencies are not bound to UC policies (and have [arguably recently violated them](#) without accountability). As a result, members expressed significant concerns about this policy and agreed that limitations on involving outside police forces should be set.

If you have any questions, please do not hesitate to contact me at rouquier@math.ucla.edu or via the Committee analyst, Tara Hottman, at thottman@senate.ucla.edu.

cc: Kathy Bawn, Immediate Past Chair, UCLA Academic Senate
April de Stefano, Executive Director, UCLA Academic Senate
Tim Groeling, Vice Chair, UCLA Academic Senate
Tara Hottman, Senior Policy Analyst, UCLA Academic Senate

May 11, 2026

To: Jody K. Stiger, Systemwide Director

Office of Systemwide Community Safety

University of California Office of the President

From: DGSOM Faculty Executive Committee

David Geffen School of Medicine at UCLA

Re: Proposed Presidential Policy — Systemwide Policies Applying to the University of California Police Department (UCPD)

Dear Director Stiger:

The Faculty Executive Committee (FEC) of the David Geffen School of Medicine at UCLA reviewed the proposed revisions to the Presidential Policy on Systemwide Policies Applying to UCPD at its executive session on May 6, 2026. The FEC appreciates the opportunity to comment and recognizes the substantial effort invested in updating a framework that has not been comprehensively revised since 2010.

The FEC supports the University's commitment to maintaining current, clearly articulated policing policies, and we acknowledge that operational and legal judgments about the use of force are properly within the expertise of law enforcement. Our comments are therefore limited to the areas where the FEC can speak credibly: the medical and public health consequences of the tools the policy authorizes, the readiness of campus health systems to respond to deployment events, and the documentation and review of resulting injuries.

Medical Consequences of Less-Lethal Tools

The peer-reviewed literature establishes that chemical irritants and kinetic impact projectiles carry a meaningful risk of severe injury, including death and permanent disability, even when deployed under standard law enforcement protocols. A systematic review of chemical-agent injuries in crowd settings documented 2 deaths and 58 permanent disabilities across 5,131 reported injuries, with risk substantially elevated in enclosed spaces and in individuals with respiratory conditions.¹ A parallel review of kinetic impact projectiles identified 53 deaths and 300 permanent disabilities among 1,984 injured individuals, and concluded these munitions are inherently inaccurate as a ballistic matter, independent of officer training.² Conducted energy devices carry a non-trivial cardiac mortality risk,

¹Haar RJ, Iacopino V, Ranadive N, Weiser SD, Dandu M. BMC Public Health. 2017;17(1):831.

²Haar RJ, Iacopino V, Ranadive N, Dandu M, Weiser SD. BMJ Open. 2017;7(12):e018154.

particularly in individuals with cardiovascular disease, psychiatric conditions, or substance intoxication.³ UC community members have sustained documented injuries from these tools during recent campus protests.

We raise this evidence not to question whether these tools should be available to UCPD, but to underscore that their deployment generates predictable, sometimes serious medical consequences that the policy should plan for explicitly.

Injury Documentation, Reporting, and Review

The revised policy does not establish a structured process for medical follow-up of individuals injured during use-of-force incidents, nor a mechanism for systematic injury documentation feeding into ongoing policy review. To the extent such processes already exist within UCPD or campus risk management, the FEC requests that they be made explicit in the policy and that resulting data be reported to a body independent of policing operations and incorporated into periodic policy review. Injury surveillance is a basic tool of harm reduction; without it, the University cannot evaluate whether its policies are achieving their stated safety goals.

The FEC further requests that officers authorized to deploy chemical agents, kinetic impact projectiles, or conducted energy devices receive training that addresses the medical consequences of these tools, and that the policy specify the consequences for deployment outside established conditions.

Health System Coordination Before and After Deployment

Deployment of chemical agents and kinetic impact projectiles in crowd settings can produce a rapid influx of patients requiring emergency evaluation, placing acute and unpredictable demand on campus and community health systems. Pre-deployment notification to designated health system leadership, when feasible, is therefore an operational patient safety requirement. The FEC requests that the health system be a full participant in after-action review following any deployment in which force is used, with explicit attention to the volume, severity, and pattern of injuries presenting for care.

Systemwide Response Team Deployment (Policy 1317.00)

Policy 1317.00 permits deployment of a standing multi-campus mobile force equipped with the full range of authorized less-lethal munitions and chemical agents at the request of a campus Chief of Police or designee, with no requirement for notification to campus health systems. The FEC requests that the policy require pre-deployment notification to designated campus health system leadership where operationally feasible, with after-the-fact notification in true emergencies, and that any deployment trigger a structured after-action review including health system participation and debriefing on the medical impact of any force used.

Mutual Aid Complaints and Host Campus Accountability (Policy 1314.00)

Policy 1314.00 provides that complaints arising from mutual aid and SRT events are investigated by the involved officer's home campus rather than the campus where the incident occurred. Where an officer from another UC campus injures a host campus community member, the investigation can proceed largely outside the host campus accountability structures. The FEC requests that the policy grant host

³Rich B, Brophy JM. Canadian Journal of Cardiology. 2015;31(12):1439-1446.

campus Police Accountability Boards equal standing in such investigations, with full findings shared with the host campus PAB.

Conclusion

The FEC does not request that any of these tools be categorically prohibited, and we do not propose specific operational redlines. We ask that, before the policy is finalized, the Office of Systemwide Community Safety review provisions governing chemical agents, kinetic impact projectiles, and conducted energy devices with explicit attention to: (1) whether injuries are systematically documented and reviewed; (2) whether campus health systems are appropriately notified and integrated into after-action review; and (3) whether training and accountability mechanisms reflect the documented potential for serious harm. The FEC offers the clinical and public health expertise of our faculty in support of that review. Thank you for the opportunity to comment.

Sincerely,

Alice A. Kuo, M.D., Ph.D., M.B.A.

Professor of Clinical Medicine, Pediatrics, and Health Policy & Management

Chair, DGSOM Faculty Executive Committee

Russell G. Buhr, M.D., Ph.D.

Assistant Professor-in-Residence of Medicine and Health Policy & Management

Vice Chair / Chair-Elect, DGSOM Faculty Executive Committee

Langston T. Holly, M.D.

Professor of Neurosurgery

Past Chair, DGSOM Faculty Executive Committee

cc: Megan McEvoy, Chair, UCLA Academic Senate

Steven Dubinett, M.D., Dean, David Geffen School of Medicine at UCLA

May 22, 2026

To: Megan McEvoy, Chair, Academic Senate

From: Dorota Dabrowska, Chair, Graduate Council

Re: (Systemwide Senate Review) Proposed Presidential Policy – Systemwide Policies Applying to University of California Police Department (UCPD)

At its meeting on May 15, 2026, the Graduate Council discussed the systemwide policies applying to University of California Police Department (UCPD). Members offer the following for consideration.

Members noted that the draft revision of *Policy 1311.00 Use of Force* removed language regarding the use of batons, tear gas, and other chemicals. Members suggest clarifying whether these items were prohibited. It was also noted that the use of tasers was not addressed in the policy.

We appreciate the opportunity to express our views on this matter. If you have any questions, please contact us via Graduate Council Analyst, Emily Le, at ele@senate.ucla.edu.

May 20, 2026

To: UCLA Academic Senate

From: Catherine Crespi, Chair, Faculty Executive Committee

Re: Proposed Presidential Policy - Systemwide Policies Applying to University of California Police Department (UCPD)

The Faculty Executive Committee (FEC) of the Fielding School of Public Health discussed the Systemwide Policies Applying to University of California Police Department (UCPD) at its May 4, 2026 meeting and solicited additional input during departmental meetings.

The FSPH FEC appreciates the opportunity to provide feedback on the UCPD policy document. However, we note that the length, organization, and format of the document posed significant challenges to meaningful review within the allotted timeframe. As a result, our comments are necessarily limited.

Committee members found the document to be lengthy and difficult to navigate, with insufficient clarity regarding which elements reflect existing policy and which represent proposed changes. This lack of transparency made it challenging to identify areas requiring focused feedback. In future policy review processes, **we strongly recommend that UC provide a concise executive summary highlighting key proposed changes.** This would greatly improve the efficiency and effectiveness of faculty review.

Despite these limitations, the FEC would like to highlight one substantive concern regarding the section on use of force. As written, the policy appears to defer broadly to California code and officer discretion. Given the unique context of a university environment and the population served, we believe the policy should articulate more explicit and restrictive guidance. In particular, we recommend clarifying that the use of force in interactions involving UC students should be reserved for extreme and rare circumstances, with more clearly defined standards and expectations.

We appreciate the opportunity to provide input and hope these comments are helpful in strengthening both the policy and the review process.

**OFFICE OF THE ACADEMIC SENATE**

Kevin Mitchell, Chair of the Academic Senate
senatechair@ucmerced.edu

UNIVERSITY OF CALIFORNIA, MERCED
5200 North Lake Road
Merced, California 95343

June 18, 2026

To: Ahmet Palazoglu, Chair, Academic Council

From: Kevin Mitchell, Chair, UC Merced Divisional Council (DivCo)

Re: [Systemwide Policies Applying to the University of California Police Department](#)

The Systemwide Policies Applying to the University of California Police Department were distributed to the Merced Division Senate Committees and the School Executive Committees for review. The following committees offered comments addressing policy clarity, governance, accountability, transparency, and alignment with the University's educational mission. Committee comments are summarized below and appended beginning on page 4.

- Committee on Academic Freedom (CAF)
- Committee on Faculty Welfare (CFW)
- Committee on Rules and Elections (CRE)
- Committee for Equity, Diversity and Inclusion (EDI)

Several committees expressed concern regarding the scope and timing of the review. CRE noted that the substantial volume of revisions complicated meaningful review, particularly during the summer months, and recommended that future policy revisions be presented in more manageable segments. CRE's comments focused primarily on improving clarity, consistency, and readability, identifying typographical errors, formatting inconsistencies, vague terminology, undefined terms, and inconsistent use of mandatory versus advisory language. The committee also recommended clarifying provisions related to use of force, bias-based policing, crowd management, complaints processes, and the relationship between systemwide policies and local regulations.

Across multiple committees, transparency and accountability emerged as central themes. EDI emphasized that several recommendations from the 2018 Senate review of UCPD policies remain unaddressed and urged greater transparency in police operations, including publication of agendas and minutes of the Chiefs' Council. EDI further recommended establishing a formal mechanism to review campus-specific police policies for consistency with the systemwide Gold Book. CFW similarly called for stronger oversight measures, including independent review of use-of-force incidents, while EDI advocated for greater transparency and public engagement regarding body-worn camera policies and the acquisition and use of military-style equipment.

Multiple committees highlighted the need for clearer governance structures and oversight mechanisms. EDI recommended clarifying procedures governing coordination with external law enforcement agencies, particularly in circumstances involving protests, immigration-related matters, mutual aid requests, and deployment of the Systemwide Response Team (SRT). The committee further recommended requiring notification of the Chancellor or designee prior to SRT deployment and during mutual aid activations, as well as clarifying investigative authority when personnel from multiple agencies are involved.

Several committees addressed use-of-force policies and de-escalation practices. CAF and CFW emphasized that de-escalation should be the primary response strategy and that force should be employed only as a last resort, particularly within a university environment dedicated to learning, inquiry, and community engagement. CAF noted apparent tensions within the policy language concerning retreat, de-escalation and use of force, and recommended revisions to ensure consistency. EDI recommended restoring language limiting strikes to situations involving self-defense, clarifying definitions of resistance, explicitly prohibiting actions that escalate tensions to justify force, and strengthening mandatory requirements by replacing permissive language such as “should” with “shall” where appropriate.

The committees also identified concerns regarding bias-based policing, officer conduct, and personnel practices. EDI recommended strengthening policies governing unlawful orders, officer misconduct, and discriminatory behavior, including the use of disparaging speech. The committee further advocated for hiring, promotion, and training practices that evaluate and strengthen officers’ commitments to diversity, equity, cultural responsiveness, crisis intervention, and implicit bias awareness. CFW similarly recommended that oversight of bias training content and assessment involve faculty expertise in diversity and equity.

Additional concerns were raised regarding policy language and definitions. EDI questioned terminology that could conflate political beliefs with unlawful conduct, particularly references to “anarchists,” and recommended clearer definitions and greater consistency throughout the document.

Finally, several committees questioned whether a single policy framework adequately addresses the diverse environments in which UC police operate. CFW recommended developing distinct policies for academic campuses, medical centers, and other public-facing facilities to better reflect their differing operational contexts and missions. More broadly, the committees encouraged revisions that would reinforce community trust, transparency, accountability, de-escalation, and alignment with the University’s educational values and commitment to equity and inclusion.

The Divisional Council reviewed the proposed policies and the accompanying committee comments via email. DivCo supports forwarding these comments for consideration by Academic Council and appreciates the thoughtful review undertaken by committees. Collectively, the comments identify opportunities to strengthen the proposed policies through greater clarity and consistency, enhanced transparency and accountability, stronger governance and oversight mechanisms, and continued emphasis on de-escalation, community trust, and alignment with the University’s educational mission and commitment to equity and inclusion.

Divisional Council particularly endorses the committees' recommendations regarding de-escalation and the prioritization of strategies that reduce the likelihood of conflict and harm. The Council believes that de-escalation should remain a central principle guiding policy implementation and operational decision-making, reflecting the University's commitment to fostering a safe, inclusive, and supportive environment for all members of the campus community.

We thank you for the opportunity to review these policies.

Cc: DivCo Members
CAF Chair LiWang
School Executive Committee Chairs
UCM Senate Office
UCOP Senate Office



ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON ACADEMIC FREEDOM (CAF)

UNIVERSITY OF CALIFORNIA, MERCED
5200 NORTH LAKE ROAD
MERCED, CA 95343

May 26, 2026

To: Kevin Mitchell, Chair, Divisional Council

From: Committee on Academic Freedom (CAF)

Re: [Systemwide Policies Applying to the University of California Police Department \(UCPD\)](#)

The Committee on Academic Freedom (CAF) reviewed the *Systemwide Policies Applying to the University of California Police Department (UCPD)* and offers the following comments:

Overall, the changes to the policy primarily focus on: 1) formatting issues, and 2) updates to state and other codes to ensure the policy remains in compliance. One other substantive change that was implemented in **sections 1301-1310**, was the addition of language indicating that “more restrictive” policies could be implemented at the campus level:

“Local regulations, including General and Special Orders, Procedural Memoranda and instructions may be written more restrictively than Policies Applying to University of California Police Department, however they may not be written to supplant or diminish the Policies and Procedures contained within this Systemwide document.”

CAF expresses concern with this language because it is broad, vague, and was added to numerous sections. On one hand, it could be interpreted as allowing a campus police department to implement additional procedures that place further restrictions on policing practices, thereby limiting potential risks to academic freedom. On the other hand, because the language does not specify who or what may be “restricted,” it raises the question of whether local campuses could create regulations, policies, or procedures that are more restrictive toward members of the campus community. CAF believes the language may be intended to convey the former; however, the wording is not sufficiently clear.

The majority of the remaining changes relate to the organization and presentation of the police departments, including details such as hats, buttons, and other items that may or may not be worn. **Section 1309.3.2** also includes revisions regarding the type of firearm that may be carried. CAF understands that this change is intended to clarify the caliber of weapon and ammunition

permitted; however, it serves as an example of an area that falls outside of CAF's expertise while still carrying important implications for the nature of the campus police force.

The most significant area of change that CAF believes warrants consideration is **section 1311. - Use of Force**. This section has been substantially revised. CAF believes that many of these changes are intended to bring the policy into compliance with state law. For example, **section 1311.3.5**, expressively prohibits carotid control holds per state law.

That said, CAF believes that this section may contain contradictory guidance. Particularly, CAF finds the following language in **section 1311.3** concerning:

"While the ultimate objective of every law enforcement encounter is to avoid or minimize injury, nothing in this policy requires an officer to retreat or be exposed to possible physical injury before applying reasonable and necessary force."

CAF believes that the wording that "nothing in this policy requires an officer to retreat or be exposed...." suggests that the use of force is acceptable whenever the force is "reasonable and necessary." CAF wonders whether "retreat" is a better word to use than "force". Somewhat confusingly, the following section, **1311.3.1 ALTERNATIVE TACTICS - DE-ESCALATION**, emphasizes de-escalation strategies, while subsequent sections outline a broad range of situations in which force may be considered "reasonable" or "necessary".

For an institution whose primary mission is learning and knowledge, CAF wonders whether de-escalation and disengagement should be more explicitly centered within the policy framework, with the use of force reserved as a more limited option. CAF recognizes that there may be technical or legal nuances to this terminology that fall outside the committee's expertise. However, given the extent to which this section has been revised, CAF does not believe that the changes present a fully coherent framework regarding de-escalation, retreat, and the use of force, nor that it sufficiently reflects the distinct context of a university police force as opposed to that of a large municipal police department.

CAF thanks you for the opportunity to review and comment on the *Systemwide Policies Applying to the University of California Police Department (UCPD)*.

Cc: CFW Members
Senate Office



ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON FACULTY WELFARE (CFW)

UNIVERSITY OF CALIFORNIA, MERCED

June 5, 2026

To: Kevin Mitchell, Chair, Academic Senate

From: David Rouff, Chair, Committee on Faculty Welfare (CFW)

Re: [Systemwide Policies Applying to the University of California Police Department \(UCPD\)](#)

The Committee on Faculty Welfare (CFW) reviewed the *Systemwide Policies Applying to the University of California Police Department (UCPD)* and offers the following comments.

The Systemwide Police Policies and Administrative Procedures (Gold Book) is a compendium of policies and procedures governing policing across the UC system and has undergone revision over the past year under the leadership of Systemwide Director of Community Safety Jody Stiger. Throughout AY 25-26, I have engaged in extensive discussions regarding the revision with members of the University Committee on Faculty Welfare (UCFW).

CFW believes that the revisions are, for the most part, consistent with the letter of the law in the state of California. The various chapters contain copious references to existing policies and procedures on matters of implementation and compliance. CFW has decided not to opine on such issues, as they are beyond the scope of the committee.

Nevertheless, CFW identifies several areas in which the underlying framework and operating principles of these documents are fundamentally flawed and strongly recommends substantial consideration. In addition, CFW notes several issues within specific sections that would benefit from further review and refinement. Specifically, CFW highlights two overarching considerations that warrant discussion and may justify a comprehensive reevaluation of the Gold Book:

1. A separation of policies and procedures that apply to medical and other public-facing facilities from campuses and places where students predominate (for example, family and student housing located off campus).
2. A consequent focus on de-escalation, especially on campuses and in places where students predominate.

CFW offers the following rationale:

1. **A two-tiered system:** UC employees who work at medical centers and similar facilities may encounter safety risks that require the use of force to protect themselves or others on a regular basis. In contrast, campuses generally serve educational and residential communities where incidents involving severe interpersonal violence are relatively infrequent. Given these differing operational contexts, CFW questions whether a single set of policies and procedures can adequately address the needs of all UC environments. CFW does not believe that a "one-size-fits-all" Gold Book is the most effective approach.
2. **A focus on de-escalation:** While CFW recognizes the need to prepare for "worst-case" scenarios (i.e. active shooters), such events remain outliers and should not determine the primary framework for policing on UC campuses.

For example, in [Section 1311.00 Use of Force](#), the notion of "de-escalation" appears for the first time on page 6 as an "alternative." CFW believes that de-escalation should instead serve as the first point of instruction for officers tasked with policing campuses and student-dominated areas (i.e. off-campus housing or a place like Castle). CFW opines that de-escalation best serves the interests of both campus communities and law enforcement personnel and should be emphasized as the first response whenever circumstances permit. Force should be a last resort, not de-escalation. The strategies, training, and approach to policing should be commensurate with the "normal" circumstances on campuses and therefore should focus on safety and not on excessive force. Research demonstrates how de-escalation limits excessive and unauthorized force, and how a culture of de-escalation cultivates better relationships between law enforcement and the communities they serve. CFW believes these outcomes should be reflected as core aspirations of the Gold Book and embedded throughout its policies and procedures.

CFW similarly objects to the inclusion of the use of military equipment in its entirety ([Section 1320.00](#)) and recommends that it be removed from the Gold Book and prohibited. CFW believes there is no need for this in the context of campus policing. In the event of an extreme emergency, the Merced County Sheriff's Office, CHP, Merced PD, and other resources, including but not limited to the State and National Guard, can be called upon. The same is true on every campus in the UC system.

UC Merced has spent several hundred thousand dollars in past years to purchase military equipment, much of it intended for crowd-control purposes. CFW believes that these purchases are preposterous in the abstract (no situation has ever arisen that would require such munitions) and create a perilous landscape of self-fulfilling prophecy (officers must be trained and therefore gain experience with the equipment; the Department must justify the purchase, which could lead to inappropriate use cases).

CFW recognizes the realities of public safety concerns; however, college campuses are environments where this equipment is rarely needed, and resources would be readily available should circumstances dictate. For example, Merced PD has two fully equipped SWAT units.

CFW offers the following specific concerns with individual sections:

[Section 1310.00 Awards and Commendations](#)

CFW recommends revising this section to:

1. include Commendations for positive contributions to campus community.

2. ensure that any officer awarded condemnation undergoes a thorough review of their personal file, specifically to prohibit commendations for any officers with use of force violations
3. prohibit commendations for any officer who, even in the line of duty to protect other students, kills a UC student.

Section 1311.00: Use of Force

As written, oversight of the use of force, including review, reporting, and disciplinary decisions, appears internal to the department. CFW believes that this structure creates challenges for officers and the broader campus community, creates the potential for real or perceived conflicts of interest, and limits independence. Accordingly, CFW encourages the development of an external oversight mechanism to review incidents involving the use of force.

CFW also notes the frequent use of the term “reasonable” throughout the policy, including references to reasonable actions, judgements, or decisions by an officer, etc. While CFW recognizes that this language may derive from existing state laws, members believe the concept is difficult to apply consistently in practice. Use-of-force incidents often occur under conditions of significant stress, uncertainty, and perceived threat, circumstances that can affect human perception, judgment, and decision-making. As a result, assessments of what constitutes a “reasonable” action may be highly subjective and susceptible to differing interpretations. CFW encourages exploration and adoption of clearer standards.

Section 1313.00 Bias-Based Policing

The policy, as written, is clear; however, this section does not establish a mechanism for determining, vetting, or periodically reviewing the anti-bias training provided to officers, including the selection of training providers, training content, frequency of instruction, and methods of assessment. CFW recommends that the University Committee on Diversity and Equity (UCODE) be given explicit responsibility to oversee this crucial element of officer training.

CFW thanks you for the opportunity to review the *Systemwide Policies Applying to the University of California Police Department (UCPD)*.

Cc: Senate Office
UGC Members

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ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON RULES AND ELECTIONS (CRE)

UNIVERSITY OF CALIFORNIA, MERCED

June 11, 2026

To: Kevin Mitchell, Chair, Divisional Council (DivCo)

From: Committee on Rules and Elections (CRE)

Re: [Systemwide Policies Applying to the University of California Police Department \(UCPD\)](#)

The Committee on Rules and Elections (CRE) reviewed the Systemwide Policies Applying to the University of California Police Department (UCPD) and offers the following comments.

The proposed revisions to Systemwide Policies Police Department (UCPD) policies encompass over 20 documents and hundreds of pages and represent the first change to the policy in over 15 years. Hundreds of lines have been changed. These changes range from simple language updates (e.g. "Universitywide" to "Systemwide") to the introduction of substantial and important new areas of coverage, including policies on the use of drones, body cameras, concealed firearms, crowd management, "bias-based policing", and a complete rewrite of the use of force policy.

CRE begins by noting that the sheer volume of material is problematic, especially given the time of year. Senate committees have limited time to examine a steady flow of documents, and our work officially occurs during the academic year. This many changes in such an impactful set of documents reviewed at the end of term and into summer is difficult to achieve properly. Still, we have done our best.

Furthermore, CRE notes that a wide range of ethical issues are raised by the document. Given our scope, we have restricted our comments to issues concerning clarity and consistency, but hope other Senate committees will address as many of the more substantive issues raised by these documents as is feasible in the available time.

[1300.00 Introduction](#)

1. CRE recommends removing the comma here, "Procedures is, 2026" and changing "it reflects" to "they reflect" (page 2).

[1303.00 Police Personnel, Organization](#)

1. CRE notes that there appears to be a line break issue in Section 1303.3.4 around (n) and (o) (pages 6-7).

[1306.00 Sworn Personnel Standards for Employment & Training](#)

1. CRE notes that there appears to be two (d) sections in 1306.5 (page 3).

[1307.00 Promotion of Sworn Personnel](#)

1. In Section I. Policy Summary “Sargent” should be “Sergeant” (page 1).
2. CRE notes a typo in “Calendar” in Section 1307.5 (page 3).

1310.00 Awards and Commendations

1. CRE notes a typo in “Council of Chief’s” in Section 1310.4.2 (page 3).

1311.00 Use of Force

1. CRE wonders whether a reference or link can be provided to ground "the legal and ethical standards of force" or a comment that relevant links are included below (page 2).
2. In Section 1311.3.3, the list of factors and hedges is expansive enough to allow use of force in almost any circumstance (pages 7-8).

1313.00 Bias-Based Policing

1. Under “Bias-based policing” (page 2), there is parenthesis closed at the end which should not be there.

1314.00 Complaints

1. Section II. Policy Text currently states, "Internal complaints shall be investigated by a Department supervisor of a rank greater than the accused employee depending on the seriousness and complexity of the investigation, as determined by the Chief of Police or their designee" (page 3). CRE wonders whether this means that an internal complaint can sometimes be investigated by someone of equal or lesser rank if the Chief of Police decides it is appropriate.
2. In Section 1314.7 “Reasonable period” is undefined (page 7).

1315.00 Vehicle Pursuits

1. The first sentence in the second paragraph under Section 1315.8.1 “Assumption of Pursuit by Another Agency” seems incomplete grammatically (pages 8-9).
2. Under Section 1315.4.5 “Air Units” should be perhaps visual “contact” rather than “content” (page 5).
3. CRE notes an inconsistency with regards to the use of "this department" versus “police department” versus “University of California Police Department” versus “University of California Police Departments.”
4. CRE notes that there appears to be a full stop missing at the end of Section III. Compliance/Responsibilities (pages 14-15).

1316.00 Crowd & Demonstration Management

1. In Section 1316.1, demonstration is defined inline, however CRE recommends that it simply be defined in Appendix A and cross referenced (or the inline definition be kept but the definition added to Appendix A) (page 2).
2. In Section 1316.3, some of the “foundational principles” don’t seem like principles. For example, “training” (page 4).
3. In Section 1316.7, a political event is not a crowd. CRE notes that similar category errors appear elsewhere in this list. All lists in the document should be checked with this kind of mistake in mind. That is, for any list, consider whether the list items fall under the category introducing the list (pages 8-9).

1317.00 Systemwide Response Team

1. CRE notes that there appears to be an inconsistency with regards to the use of “SRT Chiefs' Liaison” vs “Chiefs' SRT Liaison” vs “SRT Liaison”.
2. CRE believes it would be helpful to have a definitions section for terms such as team, squad, deployment, etc.

3. The use of “shall” versus “should” is unclear. By definition “shall” indicates a strict obligation or firm intention, while “should” indicates a recommendation, advice, or a softer expectation. CRE is unsure if “shall” in this draft is meant as a recommendation.

1318.00 Systemwide UCPD Mutual Aid

1. In Section 1318.09, there appears to be a typo at “who will”. CRE recommends the following revision: "The host campus will ensure the injured employee receives the appropriate initial medical attention needed." (pages 6-7).

1320.00 Military Equipment

1. Under Section 1320.3 d) CRE wonders why UC Irvine Police Department is singled out (page 3).

1321.00 Unmanned Aircraft Systems

1. CRE notes a numbering issue in the list in Section 1321.8 (page 7).

1322.00 UCPD Retiree Concealed Firearms

1. CRE recommends defining “immediately” concretely (e.g., specify concrete time length) (page 2).
2. CRE recommends defining and providing clarification regarding "good standing" (page 3).
3. Under Section 1322.5.1 c) it is not clear whose responsibility is to judge whether “the Qualified Retired Peace Officer Demonstrate good judgment and character” (page 6).

Other issues

1. Pronoun usage is mentioned in the cover letter, but it is not clear what the official new policy is. CRE notes that gendered language is used in some of the documents.
2. CRE notes that bracketed placeholders remain in some documents.
3. CRE notes that some but not all references to policies and laws are hyperlinked. CRE finds the links to be helpful and recommends that they be uniformly used.
4. CRE finds that there is a sporadic use of hyphens where em-dashes are intended.
5. CRE notes that “Coordinator of Police Services” appeared to be replaced with “Office of Systemwide Community Safety (OSCS)” in some but not all places.
6. Across multiple documents, Section III, "Compliance/Responsibilities" states that policies and procedures issued by a campus Chief of Police "shall have the same authority as these Policies". Although the sections later say local regulations may not "supplant or diminish" the Systemwide Policies, that language is somewhat vague. This language, which occurs in some documents, is more clear: "Each Chief of Police must ensure local departmental policies comply with systemwide policies and directives, and may adopt policies that are more restrictive, but not less".

We thank you for the opportunity to review and comment.

CC: CRE Members
Senate Office

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ACADEMIC SENATE, MERCED DIVISION
COMMITTEE FOR EQUITY, DIVERSITY AND INCLUSION (EDI)

UNIVERSITY OF CALIFORNIA, MERCED

June 5, 2026

To: Kevin Mitchell, Chair, Divisional Council (DivCo)

From: Sean Malloy, Chair, Committee for Equity, Diversity and Inclusion (EDI)

Re: [Systemwide Policies Applying to the University of California Police Department \(UCPD\)](#)

The Committee for Equity, Diversity and Inclusion (EDI) reviewed the Systemwide Policies Applying to the University of California Police Department (UCPD) and offers the following comments.

In reviewing the proposed revisions to the policies, EDI notes that in July 2018 Academic Council reviewed and approved the [Report of the Systemwide Public Safety Task Force](#) (a faculty task force assembled under UCFW) that specifically addressed the policies outlined in the then-current (2010) version of the systemwide policies on policing as well as draft chapters that appear to have been ultimately included (at least in part) in this most recent (2025) proposed revision. While some of the changes recommended by the Senate task force were implemented in the proposed revisions currently under review, many others remain unaddressed. Thus, in the course of this review, EDI will reference both the current proposed policies as well as the Report of the Systemwide Public Safety Task Force where it remains relevant (as it does in many cases). Note that as the numbering and ordering of chapters has changed between the 2010 and 2025 versions of the policies under review, any references to the 2018 Senate task force are updated to include reference to the appropriate sections in the most recent draft chapters under review as well as the original section numbering.

Overview

Upon reviewing the entirety of the new Proposed Presidential Policy Systemwide Policies Applying to University of California Police Department, EDI finds itself in agreement with the conclusions of the original Senate task force report from 2018 which suggested an urgent need to “better tailor police operations to the unique needs of a university environment,” including “a focus on the sanctity of human life, procedural justice, and more democratic and transparent approaches to policing” (page 1 of the report). While the newly proposed revisions address some of the specific concerns raised by the 2018 Senate taskforce, many others remain unaddressed and some of the changes from the 2010 UCPD policies actually appear to represent a step backwards. Below we offer some specific commentary and suggestions drawn from both our reading of the proposed policies currently under review and the 2018 Senate taskforce report.

Before addressing specific commentary, EDI notes that there is still an urgent need to holistically review policing within a university environment and the ways that it might be supplemented and eventually replaced with a more community-centered model of safety that does not rely on armed, sworn officers. While there was much discussion of these issues both nationally and at the UC in the wake of the

2020 police murder of George Floyd (as well in the previous Senate and administrative task forces on this subject), momentum has stalled in the intervening years and the proposed revisions to UCPD policies still maintain a very traditional approach to policing that does not adequately reflect either the unique university environment or the underlying structural issues around race, class, and policing that were all-too-briefly surfaced during the national reckoning around this subject in the summer of 2020. The UC is home to many qualified and talented scholars from a variety of fields who would be well-placed to help reimagine policing and public safety in the context of a public university. In addition to the technical changes outlined below, we urge UC leaders to strongly consider convening a broader body to undertake this important work.

1301.00 GOVERNANCE & APPLICABILITY OF SYSTEMWIDE POLICING POLICIES

EDI notes that the following comments from the 2018 Senate report remain applicable (page 3 of the report):

Section 101.2 [now 1301.1.2] *Departmental Policies and Procedures* allows for local UCPD departments to formulate their own local policies and procedures. As written, it states that these local policies “may be written more restrictively than [the Gold Book]. . . however they may not be written to supplant or diminish the Policies and Procedures contained within the Universitywide document.”. While the intent here appears clear, the language used (“diminish,” “more restrictively”) is somewhat loose and in the experience of some task force members there has not always been clarity on this issue at the local level. In the interest of consistency, we urge that a formal mechanism for reviewing campus regulations and procedures at the systemwide level to ensure their compliance with the Gold Book be written into this section of the document.

1302.00 STATUTORY AUTHORITY

EDI further notes that this recommendation from the 2018 Senate report remains applicable (page 3 of the report):

Section 202 [now 1302.2] *Concurrent Jurisdiction* outlines the shared responsibilities of UCPD with local law enforcement agencies. Given the realities of concurrent jurisdiction and the fact that UCPD policies and procedures may differ from those employed by local agencies, the task force suggests that there be some discussion of the way in which differences or conflicting policies are handled in such situations. This is particularly important with respect to the sensitive issues of campus protests and immigration enforcement. UCPD obviously cannot dictate the procedures followed by local agencies, but some discussion about the ways in which such differences are resolved on issues that are sensitive to the campus population seems important. This issue is particularly urgent in the area of immigration law enforcement, where campus policies may differ substantially from that of local agencies. We also suggest that the Gold Book be amended to contain language suggested by the Robinson/Edley report to the effect that “In most situations, our Police Chiefs should seek assistance from other UC campuses, rather than from non-University agencies”

1303.00 POLICE DEPARTMENT, ORGANIZATION

EDI notes that the following two recommendations from the 2018 Senate report remain relevant and unaddressed by the current changes (page 4 of the report):

Section 301.4 (a)-(e) [now 1301.1.4 (a)-(e)] which outlines the operations of the Chief’s Council does not include anything about the publication of minutes and agendas. The task force urges that in the interest of transparency that such material be published on a regular basis and that this requirement be written into the Gold Book. We recognize that some issues that come before the Chief’s Council may require the discussion of confidential materials. We routinely handle such matters in the Academic Senate through the use of executive sessions and this should not prevent the timely publication of agendas and minutes on non-confidential matters.

Section 303.4 [now 1303.3.4] *Individual Responsibilities of Officers* lists “The suppression of crime” as a key goal in subsection (c). While this is undoubtedly standard language and may imply non-

controversial actions such as securing unlocked doors, it also has associations with more controversial policies such as “broken windows policing” and “stop and frisk.” Similarly, there was concern with subsection (m) which lists “Promoting University Police morale” as a key responsibility of officers. The task force suggests that that subsection be rewritten to include a statement about the needs and morale of the university community as a whole.

1304.00 ADMINISTRATIVE COMMUNICATIONS

EDI calls attention to the following 2018 Senate recommendation which remains unaddressed (page 4 of the report):

The task force expressed some concern with sections 401.1 (a) [1304.1.1 (a)] and 404 [1304.4] with respect to lawful orders and conflicting orders. We recognize that the daily function of police departments depends on subordinates following the orders of their superiors, but are not convinced that the procedures outlined in these sections are sufficient to deal with cases of potentially unlawful orders. While not sufficiently versed in the legal nuances of this question to offer practical advice, in order to protect both the community and individual officers who receive potentially unlawful orders we suggest that OGC review this question in some depth with an eye toward how such issues are handled as part of the Uniform Code of Military Justice (UCMJ) articles 90 and 92.

1305.00 PERSONNEL, DUTIES AND RESPONSIBILITIES

EDI notes that all of the recommendations below from the 2018 Senate report remain unaddressed (pages 4-5 of the report):

Section 501 [now 1305.1] *Inappropriate Conduct* declares that “any conduct which interferes with police operations may result in corrective action or dismissal.” The task force suggests this be revised to include language to the effect that inappropriate conduct towards the community served by the police may also be grounds for corrective action or dismissal.

Section 501.1 (d) [now 1305.1.1 (d)] stipulates that officers “shall not speak disparagingly of any person or group on the basis of race, color, national origin, religion, sex, gender identity, pregnancy (pregnancy includes pregnancy, childbirth and medical conditions related to pregnancy and childbirth), physical or mental disability, medical condition (cancer-related or genetic characteristics), genetic information (including family medical history), ancestry, marital status, age, sexual orientation, citizenship or service in the uniformed services “race, color, national origin. . . .” The task force urges that this section should [be] extended beyond speech acts to extend to other forms of expression that can be disparaging to the named groups, including posting on social media, colloquial gestures, and coded forms of discriminatory or derogatory expression. It should also be made clear that such employees can be subject to whistleblower complaints when their behavior is seen to abrogate these ethical responsibilities. Additionally, a clear set of consequences should be developed to address those officers who are seen to violate this ethical responsibility, and the enforcement of those consequences should be immediate (including when accusations or whistleblower cases are under investigation).

With respect to Section 503 [now 1305.3] *False Reports*, the task force suggests that that language be added that obligates officers to correct or otherwise revise their reports whenever information is brought to their attention that contradicts the contents of their original report.

Section 505 [now 1305.5] enjoins the police to use “care to ensure that any release of information is not detrimental to the conduct of police operations.” The task force suggests that this be expanded to include consideration of the detrimental impact of releasing information on the subjects of a police encounter. As noted in the Final Report of the President’s Task Force on 21st Century Policing, “One way to promote neutrality is to ensure that agencies and their members do not release background information on involved parties. While a great deal of information is often publicly available, this information should not be proactively distributed by law enforcement.”

Section 512.2 [now 1305.12.2 (a)] *Police Identification* specifies that “Officers in uniform shall identify themselves by displaying their badge and nametag at all times unless authorized to remove the badge by a ranking officer” (emphasis added). The task force saw no reason why an officer in uniform should be able to remove their badge or nametag under any circumstances. We strongly urge that the “ranking officer” exemption be removed from this section and if any exemption is allowed that the circumstances under which it is allowed. . . be much more carefully delineated.

The task force urges that Section 512.2 [now 1305.12.12] *Impaired Physical Condition* be expanded or that a section be added regarding mental and emotional health of officers. It is by now well known that police officers have some of the highest rates of domestic violence, depression, and suicide of any profession. There should be a clear policy that obligates officers to be transparent about their mental and emotional wellness and to make reports when they believe a colleague may be having issues with their mental/emotional health. To continue to limit this policy to “impaired physical condition” and a limited definition of “psychological condition” that does not cover the full range of mental and emotional wellness is outdated and irresponsible.

1306.00 SWORN PERSONNEL STANDARDS FOR EMPLOYMENT

The 2018 Senate report contained the following recommendations (page 6 of the report):

First, a diversity statement should be added to the hiring requirements for UC police officers.

Contributions to diversity are now included in all faculty personnel cases and are being considered for staff positions at some campuses at well. Given the diversity of the campus population that they will be serving, we suggest that some formal recognition of this be included in the police personnel process in the form of a mandatory diversity statement as part of the requirements for hiring or transfer.

UC police officers are represented by The Federated University Police Officers Association (FUPOA) under the July 1, 2022 – June 30, 2026 Memorandum of Understanding negotiated pursuant to the Higher Education Employer-Employee Relations Act (HEERA) and the Regents of the University of California. Under Article 5, “Management Rights” the university retains the right “To establish the size, composition and qualification of the work force; to determine the nature of positions and whether or not to fill those positions; and to use tests, interviews and other selection techniques to hire, promote, and transfer and otherwise evaluate employees (Article 5.A.11) and To recruit, hire, train, evaluate, promote, transfer, reclassify, demote or layoff employees (Article 5.A.12).” This means the university has a clear contractual authority to incorporate criteria in a hiring and promotion process reflecting a commitment to diversity for sworn officers, without requiring a bargaining session, provided that such criteria are applied consistently and in good faith.

We strongly urge the university to exercise this management right by incorporating meaningful evaluation of officers’ commitment to diversity as articulated in [Regents Policy 4400](#) into its standards for hiring, and at a minimum, into the criteria used for promotion and transfer.

Concretely, evaluating an officer’s commitment to diversity might mean asking a candidate to describe their experience working with diverse communities, or assessing whether an officer seeking promotion has completed training on implicit bias or cultural responsiveness in policing. It might also mean evaluating whether an officer has a documented record of community engagement with multiple community groups, and how they worked with those communities to ensure safety and protection. These suggestions do not select for or against any protected class in a police officer, rather they select for professional skill demonstration and orientation to working with a diverse campus community with varied social and cultural experiences. The university’s interest is in how a police officer performs their job duties, not in who they are as a protected class.

EDI also endorses the following more general sentiments on training and the need to go above-and-beyond the minimum requirements of Peace Officer and Standards Training (POST) from the 2018 Senate report (page 6 of the report):

More broadly, the Final Report of the President's Task Force on 21st Century Policing recommends that officer training should "include mandatory Crisis Intervention Training (CIT) which equips officers to deal with individuals in crisis or living with mental disabilities, as part of both basic recruit and in-service officer training" as well as "instruction in disease of addiction, implicit bias and cultural responsiveness, policing in a democratic society, procedural justice, and effective social interaction and tactical skills." The report also recommended specific training that "covers policies for interactions with the LGBTQ population, including issues such as determining gender identity for arrest placement, the Muslim, Arab, and South Asian communities, and immigrants or non-English speaking groups, as well as reinforcing policies for the prevention of sexual misconduct and harassment." The task force recognizes that minimum training standards are defined by the California Peace Officer and Standards Training (POST) board; UCPD, however, should seek to do more than the minimum and should make every effort to ensure that its officers receive this sort of training and re-training on a regular basis and provide supplementary training for areas above not covered adequately by POST. As the Robinson/Edley report concluded, "Our police departments currently adhere to minimum POST standards on training, and they should continue to do so. But we believe that that alone is insufficient."

1311.00 USE OF FORCE

This section was extensively re-written from the 2010 version but while some of the concerns raised in earlier review were addressed, many of the comments from the 2018 Senate task force remain relevant to these proposed revisions to the *Use of Force* section as noted below (page 8 of the report):

This task force also affirmed that the use of force policy should make it explicit that officers should not use their authority to instigate actions on the part of civilians, or exacerbate tensions between officers and civilians, as a means for constructing a basis for the justification of the use of force (i.e. "set the hook"). As per Robinson/Edley, "certain police tactics are likely to increase tensions with demonstrators. Recognizing the likely impact of these tactics and considering the alternatives, where possible, can mitigate this risk. For example, the manner in which officers are outfitted, the types of weapons they carry, and how any weapons are displayed can escalate or de-escalate a situation."

Section 802 [now 1311.1.1] *Definitions* contain several instances of troubling ambiguity. "Active Resistance" is defined to include "bracing" and "tensed muscles." [rewritten simply as "tensing" in the new version] While we understand that this definition is likely drawn from Police Officer Standards and Training (POST) materials, more clarity is needed, particularly in a university environment as once a subject is defined in active resistance, it opens up a wider range of possible actions that the police may legally undertake.

In addition, EDI notes with concern that all policies dealing with firearm safety, inappropriate use of firearms, chemical agents, and less-lethal devices have been removed from this section. While some of these sections are addressed at least in part in other chapters (e.g. the section on *Use of Chemical Agents* in 1316.20), not all of the removed material appears to have been preserved in other locations. Given the importance of these subjects for public safety, it is important to understand why these sections have been removed at the very least.

EDI also suggests stronger language in Sections 1311.3.1 *Alternative Tactics - De-Escalation* and 1311.3.4 *Pain Compliance Techniques*:

As time and circumstances reasonably permit, and when community and officer safety would not be compromised, officers **should** consider actions that may increase officer safety and may decrease the need for using force [1311.3.1].

Officers **should** apply those pain compliance techniques for which they have successfully completed Department-approved training. Officers utilizing any pain compliance technique should consider [1311.3.4].

In both cases, we strongly suggest that the term “should” in the statement above be changed to “shall,” which in legal parlance means “considered to mean mandatory” rather than “considered to be advisory.”

1312.00 ARRESTS

EDI is concerned that the following sentence has been struck from 1312.2.3: “No officer shall strike an arrestee or suspect except in self-defense, to prevent an escape, or to prevent injury to another person” and urges in the strongest possible terms that it be restored to the final draft.

In addition, EDI reiterates the following concerns raised by the 2018 Senate taskforce that remain unaddressed in this iteration of the document (pages 12-13 of the report):

The task force noted that in general this chapter was very underdeveloped and failed to include basic procedures such as the need to inform those being arrested of their Miranda rights. Presumably these procedures are outlined in more detail in the policies of local campus PDs. In the interests of uniformity, however, the task force strongly recommends that this chapter be revised and expanded so as to serve as the default set of procedures for arrests systemwide. We see no reason why there should be any notable variation in such procedures across campuses and yet in the absence of a more detailed set of policies in the Gold Book such tasks must by default fall to the campus PDs. Further, there is a need to state clearly that officers should rely on alternatives to arrest (e.g., issuing a summons or citation).

Section 902.1 [now 1312.2.1] *Precautions* should be amended to suggest that officers also need to take into account the safety of bystanders when making an arrest.

1313.00 BIAS-BASED POLICING

EDI notes inconsistent use of “should” and “shall” in 1313.5 *Supervisor Responsibilities*. We strongly recommend that in (a), (b), and (d), the language should be changed to “shall” (which is already the case with item c) as these items should be required and not advisory. We similarly recommended the use of “shall” in Section 1313.7 *Administration*. These concerns also apply in 1313.4 and 1313.5 (b) where EDI also recommends the use of “shall.”

1316.00 CROWD & DEMONSTRATION MANAGEMENT

Section 1316.19 *Use of Force Options* contains several definitions which were deemed troubling by EDI and the 2018 Senate taskforce (page 8 of the report):

“Active Resistance” is defined to include “bracing” and “tensed muscles.” While we understand that this definition is likely drawn from Police Officer Standards and Training (POST) materials, more clarity is needed, particularly in a university environment as once a subject is defined in active resistance, it opens up a wider range of possible actions that the police may legally undertake. Similar ambiguity is found in the definition of “Assaultive Resistance.” It is not clear if this definition includes only physical actions taken against an officer or if it also applies to verbal statements made by the subject of the encounter. Would a statement such as “I will kick your ass if you try to arrest me!” count as “Assaultive Resistance?” This is a crucial question as it helps to determine the type of force that may be legally employed in response by the officer.

In Section 1316.20, “Only properly trained personnel **should** be authorized to deploy nonlethal chemical agents. Nonlethal chemical agents, protective masks, maintenance, storage, and security must be addressed by UCPD,” the phrase “shall” should be used instead of “should.”

Section 1316.23 *Terms and Definitions: Appendix A* contains the following definition: “Anarchist: A person who uses unlawful, violent means to cause disorder or upheaval.” This is a highly charged and inaccurate definition of anarchism. The term conflates a political philosophy with criminal behavior, and a police officer has no way of distinguishing between a peaceful self-identified anarchist from someone engaged in actual violence or purposeful disorder (would all individuals who use unlawful means be anarchists under this definition?). The conflation could increase risk management and legal exposure for the university if a police officer applied this definition to an individual’s political identity rather than conduct that presents immediate harm to the self or others in a policing situation.

1317.00 SYSTEMWIDE RESPONSE TEAM

The chapter dealing with the Systemwide Response Team (SRT) was only available in draft form during the review of the 2018 Senate taskforce as it was not yet integrated into the larger policy document. The current (2025) draft differs in some ways from the draft reviewed by the Senate, but the following comment raised by the task force remains a matter of great concern to EDI (pages 13-14 of the report):

The task force was greatly concerned that sections 1601 *Purpose* and 1603.1 *Request for SRT Deployment* make no mention of the Chancellor or their designee, leaving the dispatch and control of the SRT entirely to UC police chiefs. The Introduction to the current published version of the Gold Book makes it clear that “Responsibility for security and law enforcement at each campus is assigned to the Chancellors. . . .” As written, however, this draft chapter has no place in the SRT chain of command for the Chancellor of the campus in question or UCOP. Nor is it even stated that a Chancellor/UCOP must be notified when the SRT is requested. The dispatch of the SRT represents a major escalation that can have a profound impact on the campus community. While there may be cases where a rapidly escalating situation might require a campus chief to request the SRT before they can make contact with the Chancellor or their designee, the Chancellor must have a role in the chain of command and should be contacted and asked for approval whenever practicable. Given that the SRT is a systemwide body, the President or their designee should also be formally included in the chain of command. Finally, it must be made clear what happens if there is disagreement between the local chief and the Chancellor or UCOP over whether or not the SRT should be called upon in a particular situation. The Robinson/Edley report expressed great concern that on the campus level, “there is currently no formal link between the Incident Command System and the campus administration” and raised similar issues about the possibility of clashing UCPD and administrative decision making at the local level.²⁰ While good progress has been made on the various campuses to remedy this issue, this draft chapter on the SRT essentially replicates the same problem at the systemwide level. Given the high stakes associated with the dispatch of the SRT, this is an issue that must be urgently resolved.

Section 1606.3 [now 1317.6.3] *Discretion of Host Campus Chief* declares that “SRT personnel will not be prevented from carrying and/or using non-SRT weapons that have been issued or approved by their home campus.” As per our comment on 822.3 *Firearms, Inter-campus Use*, the task force strongly urges that policies on firearms should be consistent across campuses.

1318.00 SYSTEMWIDE UCPD MUTUAL AID

In section 1318.02 *Requesting Mutual Aid*, EDI notes that, as with the SRT, it should be mandatory that the Chancellor or their designee be notified as part of the mutual aid process.

EDI also questions why the following sentence was removed from Section 1311: “Investigation of a citizen’s complaint, involving mutual aid personnel, is the responsibility of the guest campus in conjunction with the host campus. The guest campus of the involved officer will be notified of the complaint in a timely fashion and invited to participate in the investigation.”

1319.00 BODY-WORN CAMERAS

The 2018 Senate task force commented extensively on what was then a draft chapter regarding body-worn cameras. Much of that commentary remains relevant to the current draft, as indicated below (pages 14-16 of the report):

The task force identified a key concern that cannot be easily remedied: the adoption of body cameras without any public discussion with faculty, staff or students. The task force sees this as a departure from the forms of “democratic policing” that should be embraced at a world-class public university. Democratic policing relies on civic engagement, transparency, and accountability both before and after the adoption of a new policing policy, especially one that is likely to have a significant impact on students at the university who travel across private, public, and semi-private spaces with regularity. Such a forum also would have allowed for a discussion about the rationale for adopting body cameras, community access to footage, storage issues, etc. These conversations are especially important given two recent studies, including a seven-month randomized controlled experiment, in which approximately 1000 Washington, D.C. officers were outfitted with body cameras and another 1000 went camera-less, researchers found no differences in officer use of force or civilian complaints among officers in the study. If cameras have little impact on officer behavior or civilian complaints, as the small body of existing research suggests, then what and who are the cameras for? As is, the policy reads as if the cameras are for officers only, yet the answer to this question should have evolved from a public discussion that involved various members of the campus community.

The adoption of a body camera policy must take into account the importance of accountability (which was also emphasized in a report from President Obama’s Task Force on 21st Century policing). Body cameras should not be used solely as a tool for law enforcement, as is currently reflected in the draft policy. This is especially true in the guidelines regarding officer access to video recordings during the report-writing process. There should be a very bright line between the construction of an officer’s initial report and the completion of a subsequent video-assisted report. The Task Force is strongly opposed to allowing officers to review footage prior to writing an initial report. The construction of an initial report is already a degree removed from the incident in the field. A video recording is a distinct type of evidence that is also a degree removed from the actual encounter. The difference between the two is made invisible to the public when the two sources of information – officer recollection and video evidence – are used to construct an initial report. When used in this way, the balance of the benefit of body worn camera is tilted entirely in an officer’s direction and away from the community. A model for this type of division is the Body Worn-Camera Program Amendment Act of 2015 (Washington, DC), which states that in cases of use of force members involved in a police shooting shall not review their BWC recordings, or other members’ recordings, related to the case. This policy emerged from a democratic process, in contrast to the top-down approach evidence in the current policy. The Task Force recommends at a minimum that such a policy be adopted at a minimum for all instances involving the use of force.

The prioritization of officers’ concerns is also reflected in the prioritization of officer safety. The task force recommends that the language of the policy reflect a concern for all involved in an encounter. This approach to the use of force has been embraced by a number of major police departments across the country (referred to as “sanctity of life”). The document should also use language that reflects the varied citizenship statuses of our students (for example, using “civilians” or “persons” instead of “citizens”). Officers should also be required to distribute contact cards that provide the public with relevant officer information (Name, Badge #, Supervisor, etc.), as well as information on how the recordings are used, where they will be housed, and how to access recordings of their Interaction.

In addition to these suggestions, the task force also has some suggestions for specific language to be inserted or modified within the existing draft. Section XX02 *Required Users* [now 1319.4 (a) BWC USE] gives the examples of “gang task force” and “violent crime task force.” The Senate task force assumed that this was language drawn from a municipal police manual and should be removed as UC as no need for such bodies.

1320.00 MILITARY EQUIPMENT

EDI strongly believes that the default position of UCPD should be that it *will not procure, train with, or employ military equipment*. However, we understand that AB 481 “Law enforcement and state agencies: military equipment: funding, acquisition, and use” makes the following provision:

This bill would require a law enforcement agency, defined to include specified entities, to obtain approval of the applicable governing body, by adoption of a military equipment use policy, as specified, by ordinance at a regular meeting held pursuant to specified open meeting laws, prior to taking certain actions relating to the funding, acquisition, or use of military equipment, as defined.

EDI further recommends that the university strengthen its implementation of AB 481’s public notice requirements to provide meaningful campus and public consultation. The current workflow creates a sequencing problem for meaningful input. The approval of military equipment funding, acquisition, and use happens at the Board of Regents level where the members of the Compliance and Audit Committee provide a public meeting notice in September at the Board of Regents meeting for “Consent Item: University of California Compliance with State Assembly Bill 481 (cf.

<https://regents.universityofcalifornia.edu/regmeet/sept25/audit.pdf>) for the review of inventory across the ten UC campuses alongside requests for new equipment. Afterward, each campus is to “. . . within 30 days of the submission of an annual report to the Regents, each UC Campus Police Department must hold ‘at least one well-publicized and conveniently located community engagement meeting, at which the general public may discuss and ask questions regarding the annual military equipment report and the law enforcement agency’s funding, acquisition, or use of military equipment’” (Compliance and Audit Committee, 2025, p.4).

In 2025, the following campus-level community engagements occurred:

1. UCLA: The annual military equipment report was publicly released on UCLA’s police webpage on August 11, 2025, with the “community engagement meeting . . . held via Zoom . . . on Friday, August 29, 2025” (cf. <https://police.ucla.edu/about-ucla-pd/departments-information/data-transparency/ab481>)
2. UC Irvine: Elizabeth Griffin with the UC Irvine Police Department emailed all UCI Employees (Campus, UCI Health, and College of Health Sciences, and all UC Students of the Assembly Bill 481 Annual Community Meeting) on August 21, 2025, with the annual community meeting being held on September 4, 2025 (cf. https://police.uci.edu/about-us/communications-archive/2025_AB481.pdf)
3. UC Davis: The UC Davis Accountability Board held a special session on Wednesday, September 10, 2025 (cf. <https://police.ucdavis.edu/professional-standards/policies/ab481>)
4. UC Berkeley: States it does possess or use equipment “. . .procured by the United States Department of Defense through the Law Enforcement Support Program” and its forum was held on October 15, 2025 (cf. <https://ucpd.berkeley.edu/ab-481-law-enforcement-state-agencies-military-equipment>)
5. UC San Diego: Held a presentation for students and staff on October 16, 2025 (cf. <https://ucsdguardian.org/2025/10/20/uc-regents-approve-ucsd-police-military-equipment-purchase/>)
6. UC Santa Barbara: Held an open house on November 6, 2025 for “a discussion about AB 481 equipment” (cf. <https://news.ucsb.edu/inside-ucsb/community-and-engagement/join-ucpd-open-house-nov-6>)
7. UC Santa Cruz: Held an annual meeting about AB 481 on October 21, 2025 via Zoom (cf. <https://police.ucsc.edu/how-to-make-a-report/military-equipment-use-policy/>)

Furthermore, the following three campuses have outdated information regarding AB 481 with no information about annual reporting activity for 2025:

1. UC Riverside: A webpage regarding AB 481 exists and has outdated information from 2023 (cf. <https://police.ucr.edu/assembly-bill-ab481>)
2. UC Merced: A webpage regarding AB 481 exists and has outdated information from 2022 (cf. <https://police.ucmerced.edu/ab-481>)
3. UC San Francisco: A webpage regarding AB 481 exists and has outdated information from 2022 (cf. <https://police.ucsf.edu/california-assembly-bill-481-ab-481>)

At stake in the workflow and public reporting are three distinct transparent actions that could have significant improvement to provide increased trust in policing operations across all 10 campuses.

1. AB 481 requires the following:
 - i. “In seeking the approval of the governing body pursuant to subdivision (a), a law enforcement agency shall submit a proposed military equipment use policy to the governing body and make those documents available on the law enforcement agency’s internet website at least 30 days prior to any public hearing concerning the military equipment at issue.”
 - a. Currently, there is no publicly available information posted by the governing body (the Board of Regents) of the due date for each campus’s proposed military equipment use policy; therefore, the public is unable to determine if and how the university is compliant with AB 481.
 - b. EDI recommends that the Board of Regents Compliance and Audit Committee posts the due date for each campus’ proposed military equipment use policy annually in its September agendas for accountability to the public.
2. For multiple UC campuses, the requests before the Board of Regents Compliance and Audit Committee occurred before the 30-day public hearings.
 - a. EDI recommends that each campus commits to providing public information about current inventory and requests for military equipment 30 days before the proposed military equipment policy is submitted to the Compliance and Audit Committee as a consent item.
3. California law creates two separate public notices for UC’s military equipment decision, and both contain critical gaps the university needs to amend for public trust and safety.
 - a. First, the UC is subject to the [Bagley-Keen Open Meeting Act](#), and as such, the only notice required is a posting on the internet at least 10 days in advance and provided to anyone who requests it in writing.
 - b. Second, AB 481 requires each police department to hold one “well-publicized and conveniently located” community engagement meeting within 30 days of submitting its annual report to the Regents.
 - c. AB 481 does not define “well-publicized and conveniently located” which means each campus police department is left with their own interpretation of what that definition means, instead of one systemwide policy and definition.
 - d. As the record for 2025 shows, UCLA held a Zoom meeting before the Regents vote; UC Irvine sent an email to its campus community before the Regents vote; UC Davis held its meeting through the Police Accountability Board before the Regents vote; UC Berkeley announced a meeting after the Regents vote on the police department website; UC San Diego announced a meeting after the Regents vote on its police department website, and the student newspaper explicitly noted it “was not publicized elsewhere”; UC Santa Barbara discussed AB 481 after the Regents vote during an “open house.”
 - e. Further, for 2025 at least three campuses had zero public meetings or outreach to the public for AB 481 reporting.

f. Under the University of California Police Department document submitted to the Compliance and Audit Committee for the September 17, 2025 meeting, the following provision is included:

i.1.8 Community Engagement: Within 30 days of submitting and publicly releasing the annual report, the Department shall hold at least one well-publicized and conveniently located community engagement meeting, at which the general public may discuss and ask questions regarding the annual military equipment report and the law enforcement agency's funding, acquisition, or use of military equipment (Government Code § 7072(b)).

g. It appears for 2025, only 3 of 10 UC campuses complied with Government Code § 7072(b).

4. EDI recommends the following given the uneven practices among each campus:

a. Define the notice period in policy: "Well-publicized" shall mean, at a minimum, direct email notification to all campus individuals; notice in the student (if available) and city newspaper(s), not solely on the police department website. Notice shall be provided at least 21 days before the community engagement meeting.

b. Pre-Regents Meeting: Each campus community engagement meeting shall be held no later than 30 days before the Regents consent vote.

i. This resequencing is the single most important change as it places community input in a process where meaningful engagement can influence the outcome of what is then reported to the Compliance and Audit committee.

c. Mandatory Record of Community Input: A written summary of questions, concerns, and comments raised at each campus community engagement meeting shall be compiled by the campus and transmitted to the University of California Police Department for its annual report to the Regents no less than 10 days before the Regents vote, so that community input becomes part of the formal record considered by the Compliance and Audit committee.

d. Minimum Engagement Standard: A community engagement meeting attended by zero members of the public should raise significant red flags to each campus police department, and should, as a result of zero attendance trigger a mandatory review of the notice procedures used, rather than it being reported to the Regents as evidence of community satisfaction.

e. Regents-level Notice: When the Compliance and Audit committee's agenda includes an AB 481 military equipment item, the Office of the President shall notify each affected campus Chancellor's Office, Academic Senate, Staff Assembly, and student government association directly, and no less than 30 days before the Regents meeting.

While EDI recommends that military style equipment should be entirely prohibited in all 10 campuses, if there is a lack of support for that position, then we strongly recommend that the defined problems (numbers 1 through 3) and solutions (numeral 4) be taken up as a matter of public accountability and integrity.

1321.00 UNMANNED AIRCRAFT SYSTEMS (DRONES)

As with military equipment, EDI sees no reason why a campus police department should require the use of unmanned aerial surveillance drones. If UCPD strongly believes that such systems are necessary, they should follow the procedure recommended above for "white listing" individual systems while maintaining a general prohibition on their procurement and use.

We thank you for the opportunity to review and comment.

CC: EDI Members
Senate Office



CHAIR, ACADEMIC SENATE
RIVERSIDE DIVISION
UNIVERSITY OFFICE BUILDING, RM 225

Kenneth Barish
PROFESSOR OF PHYSICS AND ASTRONOMY
RIVERSIDE, CA 92521-0217
TEL: (951) 827-5023
EMAIL: kenneth.barish@ucr.edu

June 23, 2026

Ahmet Palazoglu, Chair, Academic Council
1111 Franklin Street, 12th Floor
Oakland, CA 94607-5200

RE: Systemwide Review: Proposed Revised Policy - Systemwide Policies Applying to University of California Police Department (UCPD)

Dear Ahmet,

On June 22, 2026, the Executive Council of the Riverside Division of the Academic Senate reviewed and discussed the subject proposal along with comments from local committees. The letter provides this feedback and the Council shares much of the concerns attached and summarized below.

The Committee on Diversity, Equity and Inclusion acknowledges compliance with accreditation standards but, the committee identified five major areas of concern:

1. Training requirements: Recommends formal requirements for diversity, implicit bias, and cultural awareness training for all officers.
2. Data sharing: Advises that aggregate use-of-force, complaint, stop/contact, and arrest data be made available in public reports, rather than submitted only to the Chief of Police.
3. Stakeholder Consultation: Suggests the governance structure should explicitly include meaningful consultation with students, staff, faculty, and DEI experts on policies affecting campus interactions.
4. Use of Force policies: Expressed concern that augmented policies (e.g., rubber bullets, chemical agents) escalate violence and disproportionately impact marginalized communities.
5. Lack of clarity and measurable objectives: Notes that policies regarding officer conduct lack objective measurement and clear consequences for misconduct.

The committee also notes, "In addition to these policy issues relating to the proposed revisions, dissemination of review documents could benefit from improved accessibility and intention in the facilitation of an efficient and thorough review of these policies by relevant stakeholders".

The Committee on Academic Freedom encourages prioritizing de-escalation via collaboration with faculty rather than focusing on policing and recommends removing student conduct enforcement from

crowd behavior policies, noting that UCPD's primary duty is law enforcement, not student conduct. In addition, CAF requests the removal of "anarchists" and the associated definition from policy sections, citing that such labels are misleading and risk unfairly characterizing demonstrators.

The School of Medicine Faculty Executive Committee has strong concern regarding the militarization of the police force, specifically the potential path to acquiring offensive military hardware (e.g., .50 cal machine guns, armored vehicles). They urge that the final policy must close any loopholes that permit such acquisitions to safeguard institutional trust.

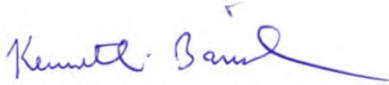
The College of Humanities, Arts, and Social Sciences Faculty Executive Committee: Echoed concerns regarding the militarization and weaponization of the campus police force.

The Committee on Planning and Budget notes a contradiction in the Mutual Aid policy regarding salary reimbursement. The current language states that regular salary is not reimbursable, yet later claims that "all reimbursable costs" include salary, which is confusing and requires clarification.

The Committee on Faculty Welfare supports policy improvements and explicitly questions the necessity of military-grade weapons and advocates for prioritizing de-escalation principles.

I trust you will find these comments helpful.

Best regards,



Kenneth Barish

Professor of Physics and Astronomy and Chair of the Riverside Division

CC: Monica Lin, Executive Director of the Academic Senate
Cherysa Cortez, Executive Director of UCR Academic Senate Office

Enclosures

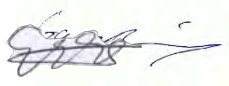


Academic Senate

COMMITTEE ON DIVERSITY, EQUITY, & INCLUSION

June 4, 2026

To: Kenneth Barish, Chair
Riverside Division Academic Senate

From: Esra Kurum, Chair 
Committee on Diversity, Equity, & Inclusion

Re: **[Systemwide Review] (Proposed Revised Policy) Systemwide Policies Applying to University of California Police Department (UCPD)**

The Committee on Diversity, Equity and Inclusion has reviewed the proposed revised policy listed above and linked review material provided. The committee appreciates the proposed revisions' compliance with external accreditation standards, and verbalized commitment to respect & civility, and avoidance of discrimination & disparaging language. Even so, the CODEI notes several points of concern regarding inclusions and omissions in these standardized policies as detailed below:

1. **Training Requirements:** The *Gold Book* does not include training requirements regarding diversity awareness, implicit bias, cultural awareness, and other topics essential for managing law enforcement in a diverse campus community. It is important for University policy to require regular diversity, equity and inclusion training for all officers, that describes bias, profiling, and how bias can be counteracted specifically relating to policing duties. We recommend the development and inclusion of standards and protocols to address these areas.
2. **Data sharing:** The policies should require public-facing transparency wherever legally permissible. The Use of Force policy requires an annual analysis report, but the current language appears to only submit the report to the Chief of Police rather than requiring public or campus-level reporting. We recommend that aggregate use-of-force data, complaint data, stop/contact data, arrest data, and trend analyses be made available to the campus community in a regular public report, with appropriate privacy protections. These reports should allow the University to assess whether enforcement actions have disparate impacts by race, gender, disability, age, campus affiliation, or other relevant categories.
3. **Consultation with campus stakeholders:** The governance structure appears to rely heavily on UCPD leadership and the Systemwide Council of Chiefs. The Police Personnel and Organization policy describes the Council of Chiefs as composed of campus Chiefs of Police, working with the Office of Systemwide Community Safety, with responsibility for reviewing police issues and developing policy through a

consensus-based process. From a DEI perspective, this structure would be stronger if it explicitly included meaningful consultation with students, staff, faculty, Academic Senate representatives, disability/accessibility experts, and campus DEI or climate bodies, especially when policies affect campus interactions, protests, arrests, use of force, mental health crises, and vulnerable populations.

4. **Use of Force policies:** Augmented use of force policies, including increased use of rubber bullets and chemical agents escalate violence against students, staff, faculty, and community members, specifically impacting Black members of these categories and those involved in anti-Zionist protesting. The current proposed documents seem to be more concerned with stifling campus protests and free speech than with campus safety at large. Development of alternative solutions and mitigations for these issues is recommended.
5. **Lack of clarity and measurable objectives:** The language included in the *1305 Personnel, Duties and Responsibilities* policy summary and 1305.1.1.d presents vague descriptions of expected conduct from officers that lack objective measurement of assessment. These descriptions do not provide an adequate insight into specific officer acts of misconduct and similarly provide no guidelines for ensuring policy adherence and consequences for deviance.

In addition to these policy issues relating to the proposed revisions, dissemination of review documents could benefit from improved accessibility and intention in the facilitation of and efficient and thorough review of these policies by relevant stakeholders.



Academic Senate

COMMITTEE ON ACADEMIC FREEDOM

June 10, 2026

To: Ken Barish, Chair
Riverside Division Academic Senate

From: Quinn McFrederick, Chair
Committee on Academic Freedom

Re: Systemwide Review of Proposed Revised Presidential Policy – Systemwide Policies Applying to the University of California Police Department (UCPD)

The Committee on Academic Freedom (CAF) reviewed the proposed revisions to Systemwide Policies Applying to the University of California Police Department (UCPD) at their June 4, 2026, meeting. Overall, the CAF encourages the prioritization of forms of de-escalation shaped by conversation and collaboration with faculty, rather than privileging policing.

The Committee recommends the following changes:

Remove “anarchists” from policy 1316.7 and remove “Anarchist: A person who uses unlawful, violent means to cause disorder or upheaval” from policy 1316.23. The Committee finds the identification of “anarchists” in these policies profoundly misleading and the definition wrong (why not, for example, include Nazis or fascists?). These policy references to anarchists risk labelling vociferous demonstrators as “unlawful, violent” by nature. The Committee requests that these mentions be removed.

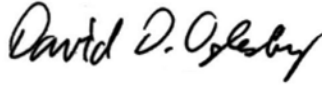
The Committee also recommends changes to policy 1316.7, which, under “Crowd Behaviors,” lists “Violations of student conduct” in “Violations of student conduct/civil disobedience.” The Committee recommends that mentions of student conduct be removed from the policy as, in previous investigations of excessive force incidents generated by poor crowd control, it has been found that confusion is generated when UCPD officers are made to enforce student conduct policy. The primary duty of UCPD is the enforcement of law, not student conduct policy. The Reynoso Task Force, “UC Davis November 18, 2011 ‘Pepper Spray Incident’ Task Force Report” (March 2012) provides greater context for this.

PLANNING AND BUDGET

May 19, 2026

To: Kenneth Barish, Chair
Riverside Division

From: David Oglesby, Chair
Committee on Planning and Budget



Re: [Systemwide Review] Proposed Revised Policy: *Systemwide Policies Applying to University of California Police Department (UCPD)*

At our meeting on May 12, 2026, the Committee on Planning and Budget (CPB) reviewed the *Systemwide Policies Applying to University of California Police Department (UCPD)*. CPB has the following comments:

- The policy on Mutual Aid states that the host campus would not reimburse the guest campus for the regular salary of the officers temporarily loaned by the guest campus to the host campus. Rather, the host campus would reimburse other expenses, such as overtime pay. This policy is different from that of faculty members, in which the host campus reimburses the guest campus for the regular salary of the loaned personnel.
- In the same policy on Mutual Aid, the following statement is confusing: "All reimbursable costs associated with mutual aid assignments include a calculation of both salary, additional pay, and benefit costs." On the surface, this statement seems to conflict with the statement above it that states that salary is not a reimbursable expense: "Salary – costs for the regular wages of personnel on mutual aid assignments are not reimbursable."



May 27, 2026

TO: Ken Barish, PhD, Chair, Academic Senate, UCR Division

FROM: Adam Godzik, Ph.D., Chair, Faculty Executive Committee, UCR School of Medicine

SUBJECT: **[Systemwide Review] Proposed Revised Policy: *Systemwide Policies Applying to University of California Police Department (UCPD)***

Dear Ken,

In response to the **Proposed Revised Policy: *Systemwide Policies Applying to University of California Police Department (UCPD)*** SOM FEC expressed growing concern about the trend of militarizing the campus police force. While we are strongly supporting the campus police and appreciate their effort to keep our campus secure, it is not clear how the options to purchase .50 cal machine guns, armored vehicles and other offensive military equipment are consistent with their mandate. While this revised policy doesn't directly support acquirement of such equipment, it seems to open a path to such purchases.

Therefore, SOM FEC emphasizes that, to safeguard the trust between faculty, students, and campus safety personnel, the final policy must close any regulatory loopholes that could inadvertently permit or normalize the acquisition of offensive military hardware.

Yours sincerely,

DocuSigned by:

Adam Godzik 5/27/2026 | 1:18 PM PDT

F3F7FC0ECB4E4AD...

Adam Godzik, Ph.D.

Chair, Faculty Executive Committee School of Medicine



Academic Senate

COMMITTEE ON FACULTY WELFARE

June 12, 2026

To: Kenneth Barish, Chair
Riverside Division Academic Senate

From: Salman Asif, Chair 
Committee on Faculty Welfare

Re: [Systemwide Review] Proposed Revised Policy: *Systemwide Policies Applying to University of California Police Department (UCPD)*

The Committee on Faculty Welfare (CFW) reviewed the revised *Systemwide Policies Applying to University of California Police Department (UCPD)*. CFW generally views the revised policies as an improvement from the previous policies. CFW has the following comments:

- It is not clear why UCPD needs military-grade weapons.
- De-escalation principles should be prioritized within the use-of-force policies.



College of Humanities, Arts, and
Social Sciences
EXECUTIVE COMMITTEE

May 27, 2026

TO: Ken Barish, Chair
Riverside Division of the Academic Senate

FROM: Rachel Wu, Chair 
CHASS Executive Committee

RE: Proposed Revised Policy: Systemwide Policies Applying to University of
California Police Department (UCPD)

The CHASS Executive Committee reviewed the Proposed Revised Policy: Systemwide Policies Applying to University of California Police Department (UCPD). The committee was concerned about weaponization on campus and did not see why UCPD needed military grade weapons on campus.



OFFICE OF THE ACADEMIC SENATE

9500 GILMAN DRIVE
LA JOLLA, CALIFORNIA 92093-0002
TELEPHONE: (858) 534-3640
FAX: (858) 534-4528

June 26, 2026

Professor Ahmet Palazoglu
Chair, Academic Senate
University of California
VIA EMAIL

Re: Divisional Review of Proposed Revisions to Systemwide Policies Applying to University of California Police Department (UCPD)

Dear Chair Palazoglu,

The proposed revisions to Systemwide Policies Applying to University of California Police Department (UCPD) were distributed to San Diego Divisional Senate standing committees and discussed at the June 8, 2026 Divisional Senate Council meeting. Senate Council did not support the revisions as proposed, recommending further review and modification. The attached divisional committee comments provide further details on specific changes that are recommended. Senate Council's discussion focused on four common themes that emerged during review that need to be more prominent in the policies.

1. The policies would benefit from a more forthright acknowledgment that policing on campus is not the same as municipal policing. There should be greater emphasis on the distinctive opportunities for de-escalation and community engagement that exist on UC campuses to build trust between the police and faculty, students, and staff. Reviewers would like to see more incorporation of recommendations from the [Robinson-Edley report](#) in the updated policies and procedures.
2. What constitutes appropriate and inappropriate use of force needs to be defined more precisely and linked to clearly articulated operational guidance.
3. The policies fail to clearly address passive resistance and nonviolent protest. The policies should not lump passive resistance in with "non-compliance," but should establish it as a distinct category with specific protocols.
4. The policies need to prioritize de-escalation strategies and collaboration with mental health resources. Reviewers recommend elaborating on procedures for how and when UCPD engages with mental health emergency response units.

The responses from the Divisional Committee on Crisis Mitigation, Committee on Diversity and Equity, Committee on Faculty Welfare and Committee on Campus Community and Environment are attached.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Jo Plant".

Rebecca Jo Plant
Chair
San Diego Divisional Academic Senate

Attachment

cc: Akos Rona-Tas, Vice Chair, San Diego Divisional Academic Senate
Lori Hullings, Executive Director, San Diego Divisional Academic Senate
Monica Lin, Executive Director, UC Systemwide Academic Senate

May 29, 2026

PROFESSOR REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of Systemwide Policies Applying to University of California Police Department (UCPD)

Dear Chair Plant,

At its May 19, 2026 meeting and in a follow-up email deliberation, the Committee on Crisis Mitigation (CCM) reviewed the proposed revisions to Systemwide Policies Applying to University of California Police Department (UCPD). The Committee endorsed the revisions and offered the following comments for consideration:

The Committee applauded the revisions and found the policy to be well written and thoughtfully revised. CCM particularly appreciated the addition of introductory language at the beginning of each chapter summarizing the purpose and intent of the section, noting that it improves accessibility for readers.

Section 1301: Governance and Applicability

- The Committee noted that the “compliance/responsibility” language is repeated throughout the chapter and recommended either streamlining the language or clarifying why the repetition is necessary.

Section 1303: Police Department Organization

- The Committee noted inconsistencies in references to “Police Services” and “Council of Chiefs” throughout the policy and recommended revising the language for consistency.

Section 1304: Administrative Communications

- The Committee recommended providing specificity for the phrase “as soon as possible” in Section 1304.2.1.
- The Committee expressed concern that the language in Section 1304.4 regarding conflicting orders may not align with applicable law. The Committee recommended revising the sentence stating that, “...the order shall stand and be obeyed to the best of an employee’s ability *unless manifestly unlawful*.”

Section 1305: Personnel, Duties and Responsibilities

- Under 1305.1.3 Discounts, the Committee suggested adding an exception clarifying that publicly offered class discounts, such as first responder or nationwide corporate discount programs, are permissible.

Section 1311: Use of Force

- The Committee expressed concern that the language in Section 1311.3.7 regarding restraints or transportation methods that impair breathing may be inconsistent with existing prohibitions on chokeholds. The Committee recommended clarifying the provision to address other restraint methods that may impair breathing or cause asphyxiation.

- The Committee suggested adding language addressing positional asphyxia and respiratory distress. For example, “*Whenever possible, avoid tactics that may impede a subject's ability to breathe, result in chest or throat compressions, or airway blockage*”; “*position the individual in a manner to allow free breathing once the subject has been controlled and placed under custodial restraint*”; and “*seek medical assistance immediately if a person appears to be having difficulty breathing or is otherwise demonstrating life-threatening symptoms.*”
- Under 1311.1.1 Definitions, the Committee requested clarification on the definition of “force” and whether the policy intends to include or exclude the use of chemical agents or other weapons, noting that this is currently not explicitly addressed in the language.
- Under 1311.9 Training, the Committee requested additional details regarding the substance and scope of the required de-escalation and mental health training.
- The Committee suggested revising Section 1311.9.1 to explicitly specify training topics such as, “the *prohibition* of chokeholds and carotid holds”.

The Committee extends its thanks for the opportunity to opine on the revised Policy.

Sincerely,

Jennifer MacKinnon
Vice Chair
Committee on Crisis Mitigation

cc: Akos Rona-Tas, Senate Vice Chair
Lori Hullings, Senate Executive Director
Merelyn Cedeño, Senate Executive Assistant
William Mobley, Chair, Committee on Crisis Mitigation

June 5, 2026

REBECCA PLANT
Academic Senate, San Diego Division

SUBJECT: Systemwide Policies Applying to UCPD

At its June 5th, 2026 meeting, the Committee on Diversity and Equity reviewed the Systemwide Policies Applying to UCPD Proposal.

- The Committee noted potentially positive changes to the policies from CDE's viewpoint:
 - 1305 I, Policy Summary: *"The policy calls for Professionalism both on and off duty for sworn police officers. Employees are expected to treat all people with respect, avoid discrimination or bias of any kind, and maintain civility in every interaction."*
 - 1305.1.1.d: *"Employees shall not speak disparagingly of any person or group on the basis of race, color, national origin, religion, sex, gender identity, pregnancy (pregnancy includes pregnancy, childbirth and medical conditions related to pregnancy and childbirth), physical or mental disability, medical condition (cancer-related or genetic characteristics), genetic information (including family medical history), ancestry, marital status, age, sexual orientation, citizenship or service in the uniformed services."*
 - Removal of potential discriminatory statements related to hair/nails/make-up.
 - 1311.3.5 and 1311.3.6 explicitly state that carotid control and chokehold use of force actions are banned.
- The Committee offers the additional following comments and concerns:
 - The policy does not include any reference to the use of equity, diversity, or inclusion in the processes for promotion and awards
 - The Committee expressed concerns in 1311.1.1 that the definition on "Non-Compliant" includes "passive resistance". These passive resistance acts are common in protests and civil disobedience, and the Committee was concerned that the use of force policy does not protect passively resistant protestors from unnecessary force.
 - The Committee noted that while there is an annual training on mental health, the policy does not have mental health emergency response options (such as Triton Core at UCSD); while this may be outside the scope of this specific policy, the Committee noted that officially adding this option to a UC-wide policy is important.

Sincerely,

Ross Frank, Chair
Committee on Diversity & Equity

cc: M. Cedeno
L. Hullings
A. Rona-Tas

May 29, 2026

PROFESSOR REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of Systemwide Policies Applying to University of California Police Department

Dear Chair Plant,

At its May 20, 2026 meeting, the Committee on Faculty Welfare (CFW) reviewed the proposed revisions to the Systemwide Policies Applying to University of California Police Department. CFW recognizes the importance of maintaining campus safety and appreciates the effort to update Police Policies and Administrative Procedures to reflect changes in law, policing standards, and community expectations. At the same time, the Committee identified several concerns regarding clarity, oversight, de-escalation practices, surveillance, and the broader impact of the policies on campus climate and faculty welfare. CFW offers the following comments and recommendations:

- **Emphasis on escalation versus de-escalation**
CFW was concerned that the policies appear to place greater emphasis on escalation procedures and use of force than on de-escalation practices. Members noted that de-escalation guidance appeared comparatively limited and would benefit from greater specificity, detail, and prominence throughout the policies.
- **Community policing and outreach**
The policies contain relatively little discussion of community outreach, trust building, or community policing practices. CFW encourages stronger emphasis on relationship building, transparency, and proactive engagement with the campus community, including consideration of incentives or recognition for effective de-escalation and community-based policing.
- **Weapons and military equipment**
CFW expressed concern regarding the scope of firearms, controlled devices, and military style equipment authorized for use on a university campus. Members questioned the necessity and proportionality of certain equipment in the campus environment and requested additional clarity regarding oversight, approval, and review processes governing the acquisition and use of such equipment.
- **Use of drones and surveillance technologies**
CFW discussed concerns related to unmanned aircraft systems and broader surveillance practices. While the policies include some discussion of privacy protections, additional clarity would be helpful regarding drone use in residential areas of campus, standards governing deployment, and the system of public notification referenced in the policy. Members also expressed concern about the potential impact of surveillance practices on expressive activity and academic freedom, particularly in heavily monitored public campus spaces.

- Use of force standards
CFW believes the policies would benefit from more detailed discussion of what constitutes excessive or unnecessary force, particularly in campus settings. Members also noted concern that firearms are treated as standard equipment while body cameras appear less consistently emphasized.
- Mutual aid and involvement of outside agencies
CFW recommends additional clarification regarding the circumstances under which outside law enforcement agencies may be called to campus under mutual aid provisions, including decision making authority, oversight mechanisms, and how use of force standards are applied when external agencies operate on UC campuses.
- Clarity, accessibility, and policy navigation
Members noted that some sections contain extensive procedural detail while other important areas defer broadly to the discretion of the Chief of Police or reference policies without directly linking to them. CFW recommends clearer cross referencing, direct links to referenced policies, and the development of more accessible explanatory materials for community members without legal or policing expertise.

Discussion within CFW reflected differing perspectives regarding both the scope of the Committee's review and how the Committee should respond to the proposed policies. Some members felt it was important to engage in more detailed review of specific policy provisions, while others expressed the view that because CFW does not include specialists in policing, law enforcement operations, or legal compliance, the Committee's review should remain focused primarily on issues of faculty welfare, campus climate, transparency, accountability, and community trust rather than technical questions of policing practice.

Members also differed regarding the extent to which recent campus events and protest responses should be referenced in the Committee's response. Some members felt it was important to address concerns related to mutual aid, outside law enforcement involvement, surveillance practices, and the use of force in protest contexts, while others cautioned against incorporating disputed characterizations of recent events into the committee's response and emphasized the importance of keeping the review focused on broader faculty welfare concerns rather than debates about particular incidents.

Despite these disagreements, members generally agreed that additional clarity regarding oversight, transparency, de-escalation practices, and protections for expressive activity would strengthen the policies and improve community trust. CFW received highly detailed technical and policy comments from committee members regarding specific provisions of the proposed revisions. Those comments are attached separately as Appendix A for reference and consideration. A single CFW member expressed strong concern that the policies do not sufficiently clarify standards regarding mutual aid requests, outside law enforcement involvement, surveillance practices, and the use of force in protest contexts. At their request, those specific concerns are included separately as Appendix B.

Sincerely,

Amy Adler
Chair
Committee on Faculty Welfare

cc: Akos Rona-Tas, Senate Vice Chair
Lori Hullings, Senate Executive Director
Merelyn Cedeno, Senate Executive Assistant
Jeffrey Clemens, Vice Chair, Committee on Faculty Welfare

Appendix A: Supplemental Technical and Policy Comments Submitted by CFW Members

The following additional detailed observations regarding specific provisions of the draft policies were submitted for reference during CFW review of the proposed UCPD policy revisions. These supplemental comments reflect detailed analysis prepared by individual committee members and were not separately reviewed or endorsed line by line by the full committee.

We appreciate the opportunity to provide constructive feedback on the UC Police Policy and Administrative Procedures (Gold Book) revisions. Specific examples and suggestions are organized below within common themes.

1. Shift emphasis and language to support community policing and de-escalation rather than indications and techniques for escalation

- Emphasis on de-escalation Rather than being listed as an “alternative tactic”, De-escalation should be a distinct section within the policy document, to highlight the importance of this practice within the University community, provide examples of techniques that may be employed in anticipation or during contact to the same extent provided for use of force, and provisions for mutual aid, public agency or community-based resources to assist with intervention.

Document 1311.00 also should lead with the current Section 1311.3.1 on de-escalation, to reinforce that is the first priority for safety. Thank you for prioritizing de-escalation in annual training requirements, section 13119.1 and in 1317.5.2 SRT training.

- 1309.2.2 Authorized Uniform Specifications The authorized uniform requires UCPD officers to carry a handgun and ammunition, baton, Taser and oleoresin capicum spray at all times. Recommendation is that these items are re-classified as optional, on par with the current 1st responder equipment (CPR mask and gloves), as well as a knife (which may also serve as a tool). Peace officers would be able to have discretion as to the extent of weapons required for the task/response.

This would be a first step, recognizing that the majority of interactions on campus are non-confrontational. We would encourage a transition to a larger number of officers patrolling and responding on campus without weapons, and that armed response becomes an escalation rather than default.

Per 1311.6, officers have an obligation to render medical assistance in the event of injury due to use of force. Therefore, any officer armed with lethal weapons should be required to also carry appropriate 1st response equipment as part of their uniform/supplies. This would also apply to 1317.6.2 for all SRT personnel given authorization to carry/use chemical agents and kinetic energy weapons.

- 1310.00 Awards and Commendations Recommendation to add one or more Medal for Community Policing innovation and/or excellence in de-escalation, and specific language within the Distinguished Service Commendation to include community policing, outreach and de-escalation as criteria for outstanding and exemplary service.
- Good standing is an appropriate concept expressed in 1306.6 for reappointment of former sworn personnel, however the good standing criteria are not referenced. Since this is a UC policy, that

should be added to this document. Areas that potentially overlap good standing and may benefit from term use/alignment:

1306.5, 1307.1 and 1307.4 regarding potential lateral /in-class transfers and promotion to Sergeant and higher ranks, in addition to the other stated requirement for application,

1310.4.3 Nomination Review, that candidates for Medals/Commendations must be in good standing at the time of nomination and award.

1314.00 Complaints regarding clarification of good standing during review and upon investigation disposition.

1317.4.3.1 and 4.3.2 SRT Minimum Process/Qualifications for Selection

1311.2.3 Failure to Intercede and 1311.2.4 Duty to Report Excessive Force should also be considerations for meeting good standing.

- Worst Case Scenarios Understanding policy structure and training needs to be present for unusual circumstances, there remains concern regarding normalizing escalated responses such as 1315.00 Vehicle Pursuits, 1317.00 Systemwide Response Team, 1230.00 Military equipment and 1321.00 Unmanned Aircraft Systems. Additional outreach efforts and engagement with campus constituents is recommended to improve communication and understanding of if/how/when these tactics would be employed, opportunities for campus organization representatives to observe training scenarios, necessity for each campus to have militarized equipment, and how escalation to mutual aid and multi-agency coordination is undertaken.
- Recognition of Complaints The 1314.00 Complaints document is incomplete. There are multiple bracketed inserts that need to be appropriately populated, e.g. [UC Campus specific] , [campus-specific office to implementing or investigating these policies], [X (UCX)], [The Responsible Officer], [The Chief of Police and Council of Chiefs], [Campus – Specific Position], [the UCX campus-specific website] and multiple others in addition to multiple phone numbers listed as (xxx) xxx-xxxx.
- Surveillance 1316.00 reaffirms that random surveillance is prohibited.

1316.12 Incident documentation - Clarification is requested as to how the photography, audio and video recordings are obtained (e.g. by officers during event or securing existing public/private recordings after incident). Concerns were expressed by faculty regarding a lack of clarity of who controls the video cameras on each campus and why a guiding policy structure for their use is not provided, comparable to detail in the body worn camera and UAS/Drone sections, inclusive of length of data archive, and if/when data is shared with non-UC entities.

1319.1 Body Worn Cameras includes statement that the policy does not apply to undercover operations, or legal wiretaps, or eavesdropping (concealed listening devices). The reference policies/links for those activities on UC campus/property should be inserted, or detail provided as to the responsible jurisdiction for those procedures.

1319.5.5 notes that officers are obligated to wear BWC in obvious manner and answer truthfully when asked if BWC is activated, but are not required to disclose. There does not appear to be an opt out provision for individuals, other than 1319.9 (c) training section on how to respond to an individual's request to stop recording, and 1319.5.7 allowing for officer discretion for privacy, including an individual wishing to be anonymous. 1319.7.4 only enables police officers, rather than the individual recorded, to request deletion of accidental recording prior to the 60-day cycle for deletion of non-evidentiary BWC media in 1319.8.

- 1320.00 UAS While drones are characterized in 1320.00 as Military Equipment to be used only when no other reasonable alternative exists, section 1321.00 expands the circumstances for search and rescue, disaster response, critical investigation, and “other situations when other tools are less effective.” This needs to be reconciled, given associated policies and concerns regarding surveillance and privacy across a campus environment.

1321.3 Privacy uses examples more typical of a residential neighborhood (e.g. residence, yard, enclosure) than a campus. Please expand the language to define private spaces on campus for students and community members.

2. Increasing detail regarding firearms, weapons, and techniques to match extent of detail provided in other policies

- Incomplete policy documentation Multiple policies related to systemwide policing are referenced in the document but not provided. These respective policies need to be included in this document/review and/or link to approved document published online.

Department Firearms policy, 1308.00 Sec I and 1309.00 Sec I, 1309.2.2.28, 1311.1
Control Devices and Techniques 1309.2.2.39, 1311.1
Conducted Energy Devices 1311.1
Medical Aid and Response 1311.6
Personnel Complaints 1311.7.2

This was accomplished in section 1316.5 to the Law Enforcement Guide for Emergency Operations (Red Book) as a link, and with the Body Worn Cameras, as a uniform item and distinct policy within the Gold Book.

- Added policy detail required. These items require updating to the level of additional specificity provided for uniform items, rather than blanket language that the Chief of Police must approve. While there may be areas of latitude, these sections currently have insufficient detail for a document of this scope, to meet the compliance/responsibility in Section III.

1309.2.2.28 Semi-automatic firearm,
1309.2.2.29 Holsters,
1309.2.2.30 Uniform Gun/Duty Belt,
1309.2.2.31 Batons,
1309.2.2.33 Handcuff/Key,
1309.2.2.38 Portable radio/Holder/Microphone/Earpiece,
1309.2.2.41 Helmets,
1309.3.2 Semi-automatic pistol

Additionally, this detail is necessary given the volume of Category 10 specialized firearms included on annual military equipment inventories

(<https://regents.universityofcalifornia.edu/aar/septaudit.pdf>)

- 1311.3.4 Pain compliance techniques references Department-approved training in these methods. Recognizing the list may not be comprehensive, discrete examples of approved techniques which are part of that training should be detailed.
- 1316.20 Use of Chemical Agents Current language states “Use of chemical agents against passive resisters is prohibited absent exigent circumstances.” We strongly recommend that this is changed to “Use of chemical agents against passive resisters is prohibited.”

3. Other document organization and edits

- Unlawful vs discrepant orders Section 1304.4 should distinguish between chain of command and clarification when discrepant orders may occur, discrete from junior officer response and protection in response to a known unlawful order, as existing policy defaults to immediate suspension per 1304.3.
- Off-duty provisions are scattered through the document; some which may better be highlighted grouped into a specific section, understanding some are inclusive of on and off duty requirements. These include:
 - 1305.9.3 Alcohol, Drugs, Narcotics – Off-Duty
 - 1305.12.6 Emergencies, Off-Duty Response.
 - 1305.12.12 Impaired Physical Condition (mixes on and off duty reporting)
 - 1305.12.13 Law Enforcement Contact (mixes on and off duty reporting)
 - 1308.2.4 Restrictions on Wearing (mixes on and off duty uniform use, which in this document overlaps with weapons)
 - 1308.7 Prohibited use of uniform/deadly weapons -Picketing. This section should be renamed, to reflect the content, which is that officers involved in "picketing or informational activities related to a concerted refusal to work" cannot wear uniforms or carry weapons.

1309.2.2.28 Semi-automatic firearm (Off-duty weapons) refer to the Department Firearms policy, which needs to be included in this document/review and/or link to approved document published online. Separately, it is in conflict with 1308.2.4 restrictions on wearing the uniform, as that policy states the uniform components cannot be worn off-duty.

1311.5 Reporting the use of force (includes off-duty requirement to report

- Competitive recruitment Recognizing that retention requires a pathway for promotion, the policy 1307.3 that if at least 10 current and qualified UCOP officers apply for promotion to Police Sergeant, no external candidates may be considered seems to conflict with UC policies regarding competitive recruitment processes for staff (PPSM 20 <https://policy.ucop.edu/doc/4010393/PPSM-20>). If this is a provision of a contract negotiation, that would be helpful to note, rather than stating as a UC policy.

- Report requirements are inconsistent within the document, detailed in some examples (1311.5.2 Use of Force, 1315.12 Vehicle pursuit, 1314.00.D.1. Complaints) and no detail in others (1312.00 Arrests).

- Redundant/potential conflicts

1312.2.5 Vehicle Pursuits. Each Campus shall adopt a vehicle pursuit policy appears to be superseded by 1315.00

1316.19 Use of Force within the Crowd and Demonstration provides additional details and case law citations beyond policy information in 1311.00 Use of Force. Recommend consolidating/harmonizing in one location, with reference to the other.

- Typographical errors

1307.5 calendar should be calendar

1311.1 "... and unlawfully opposing the lawful order...officer's lawful attempt..." should be edited to remove redundancy.

1313.8.1 "[Training Manager]" seems to be a placeholder; please clarify

1315.8.2 2nd paragraph, remove "Berkeley"

1314.00G.1. and G.3.a. and 1322.7 Clarify if notification is calendar days or business days.

1319.3.1 (i) and (j) BWC Coordinator Responsibilities is incomplete, with [recordsHead], [recordsBureau] and [propertyBureau] fields needing to be populated.

1319.7.1 [Records Manager] and [coordinator] fields need to be populated.

1320.3 (d) Currently states University of California Irvine Police Department.

Appendix B: Supplemental Comments Submitted by Individual CFW Member

These considerations point to an important issue that appears to be missing from the current policies we are reviewing, concerning when and how external force is used.

1. External Police Forces

Background: Multiple UC campuses in 2024 made a decision to outsource the clearing of encampments to large external police forces. Many faculty regard what was done to idealistic students during that time as traumatic, as involving excessive and unnecessary force. While it is plausible that a campus such as UCSD with 50 sworn officers could have used the UCPD to remove the encampment, it did not. Instead it brought those external forces who are not constrained by campus considerations of balance, such as the 49 recommendations of UC's Robinson-Edley report laying out police and campus responses to protests: <https://campusprotestreport.universityofcalifornia.edu>. The historical record, including a notorious fatality incident at Berkeley, shows that they have hurt people, including innocent bystanders. With this background in mind, the only reference to external forces that this reviewer sees in the documents is one sentence in document 1318 which says: "Priority is given to internal UCPD mutual aid prior to requesting external mutual aid". It is urged that the revisions to these documents spell out in as much detail in possible the considerations and decision-making process regarding bringing in external police forces, and by referencing the Robinson-Edley report.

2. The responsibility of UC PD to intervene

Document 1311 is about use of force and elaborates in several places that "[UCPD] Officers are required by California law to intercede and report if they observe another officer using excessive or unnecessary force" and it explains that they can be subject to discipline if they do not act. The duty to intercede apparently applies to their observing officers of different forces too, Cal Govt Code § 7286. Can these policies elaborate this responsibility of UCPD to intercede when they observe "unnecessary and excessive force" meted about by external police forces that are brought to campus, and relatedly, how this relates to the decision about whether to bring external forces?

3. Surveillance Cameras

This reviewer did not see a section on this in the documents we reviewed, but a member of our committee who is part of more extensive review, including section 1316.00 noted that "Concerns were expressed by faculty regarding a lack of clarity of who controls the video cameras on each campus and why a guiding policy structure for their use is not provided, comparable to detail in the body worn camera and UAS/Drone sections, inclusive of length of data archive, and if/when data is shared with non-UC entities." A related but new point concerns the surveilling by UCPD cameras of "free speech" spaces and the impact that has on that speech. For example, at UCSD the new time, place and manner policies mostly limit free speech to the areas in front of Geisel library. Yet that space is heavily surveilled by cameras. It is widely believed by students and faculty that data from those cameras are shared with the Feds or other powerful institutions, or could be, and this clearly functions to inhibit speech on key issues of the day. The current policy needs to discuss whether free speech spaces should be surveilled by the UCPD, how such camera data from free speech spaces are or are not shared; and recognize explicitly the very concerning impact of surveilling free speech on people's willingness to exercise their speech. The university cannot only be about security and safety, it also has a mission for civil society and the development of the whole person. These considerations must be balanced, including in a preamble to these UCPD policies.

May 22, 2026

PROFESSOR REBECCA JO PLANT, Chair
Academic Senate, San Diego Division

SUBJECT: Review of Systemwide Policies Applying to University of California Police Department (UCPD)

Dear Chair Plant,

At its May 20, 2026 meeting, the Committee on Campus and Community Environment (CCCE) reviewed the proposed revisions to the Systemwide University of California Police Department (UCPD) policies. The Committee appreciated the substantial effort that has gone into revising these policies. However, all but one Committee member opposed the revisions in their current form due to several major substantive concerns regarding use of force standards, community accountability, and governance structure. The other member did not oppose the revisions overall, but nevertheless agreed with important concerns below.

The Committee's opposition centered on three key shortcomings of the revised documents:

1. Vagueness Regarding Appropriate Use of Force (Document 1311)

The Committee was deeply concerned that the revised policies provide insufficient clarity regarding what constitutes appropriate use of force, especially — though not exclusively — in situations involving passive resistance or peaceful protest activity. Terms such as “reasonable,” “objectively reasonable,” and “apparent need” appear repeatedly throughout the policies without sufficiently clear operational guidance or limiting principles.

Relatedly, the Committee was concerned that the policies appear to carve out situations involving passive noncompliance from certain force limitations without explicitly describing what procedures or uses of force are permissible when officers encounter passive resistance. Members emphasized that these are inherently difficult operational situations, but believed the revised policies require substantially greater specificity.

The Committee also noted that the policies devote substantial attention to resisting arrest and failure to comply, but provide insufficient discussion regarding the antecedent question of when arrests themselves are appropriate and justified, especially during protests or demonstrations involving passive resistance.

The Committee was particularly concerned that the revisions remove substantial prior language governing firearms, chemical agents (including tear gas), police batons, and electronic control devices without clearly replacing those provisions elsewhere in the revised policies, particularly within Document 1311. Several members expressed concern that removing explicit restrictions and standards may increase ambiguity precisely in situations where clearer guidance is most necessary.

2. Lack of Community Engagement and Community-Oriented Policing (Document 1303)

The Committee was concerned that the revised policies conceptualize policing largely as an internally governed enforcement function rather than as an ongoing collaborative relationship with the campus community. Members noted that the policies emphasize crime prevention, enforcement, and arrests while providing little discussion of sustained community interaction outside emergency or crisis situations.

The Committee believes that university policing differs in important respects from municipal policing and should explicitly acknowledge obligations to engage constructively with the campus community on an ongoing basis. Members therefore strongly recommended creation of a new policy document within the systemwide policing procedures requiring structured and continuing engagement between UCPD and campus constituencies outside crisis contexts.

3. Governance, Oversight, and Emergency Modification Authority (Documents 1300–1301)

The Committee expressed concern regarding provisions that allow emergency additions, deletions, or modifications to policies with limited review processes. Members believed that systemwide policy should anticipate difficult situations in advance, rather than relying on emergency revisions during crises.

The Committee also raised concerns regarding ambiguity in the relationship between local campus policies and systemwide policies, including the extent to which smaller representative bodies may effectively alter or supersede broader governance structures through emergency procedures or delegated authority.

Additional Concerns and Recommended Revisions

- Documents 1301 and 1318 should more clearly explain the relationship between internal UC mutual aid and coordination with outside law enforcement agencies. Several members raised questions regarding prioritization of internal UC mutual aid versus outside agencies such as municipal police departments or federal authorities.
- Document 1305 should clarify whether references to actions “consistent with law” refer to federal law, state law, or both. Members specifically raised questions regarding situations in which requests or directives from federal authorities (e.g., ICE) may conflict with state law or University policy.
- Document 1311 should clarify the respective roles of Chancellors and police chiefs in authorizing or overseeing enforcement actions during protests and demonstrations.
- Several members expressed concern that enforcement actions during peaceful protests should be tied to legitimate operational or accessibility concerns rather than framed primarily in terms of removal or dispersal.
- Some members expressed concern that Section 1311.2.3 establishes obligations to report excessive force but does not sufficiently emphasize officer training and a culture of conduct that stops excessive force in real time.
- Several members suggested that use-of-force reports referenced in Document 1311 should be publicly available in appropriately redacted form to promote transparency and accountability.
- The “Compliance/Responsibilities” section of most documents would benefit from clearer explanations regarding severability when local campus policies conflict with systemwide rules. Specifically, the policies should clarify that only the specific conflicting provisions of local policies are rendered void, while the remainder of local campus policies remain operative and unaffected.
- Several members suggested aligning police masking requirements in Document 1305 with broader campus masking standards. Police should not be allowed to mask if community members are not.
- Documents 1305 and 1318 should provide clearer guidance regarding mutual aid supervisory structures, including clarification of whether supervisory authority rests with host-campus or guest-campus supervisors during deployments, how local restrictions or campus-specific regulations are communicated to guest personnel, and how obligations to home campuses interact with deployment responsibilities.

- Document 1318 would benefit from clearer operational standards governing reimbursement timelines and minimum standards for food, rest, and logistical support during mutual aid operations.
- Document 1305 should provide clearer cross-referencing and citation of related conduct and disciplinary policies referenced throughout the document.
- Document 1309 would benefit from improved clarity regarding off-duty firearms policies and references to departmental firearms requirements.

In summary, the Committee believes the proposed revisions require clearer operational guidance on use of force and arrests; explicit recognition that community engagement and accountability are critical and ongoing; and stronger governance and oversight mechanisms that limit ambiguity in emergency situations. The Committee therefore opposes the revisions in their current form.

Sincerely,

Simeon Nichter, Chair
Committee on Campus and Community Environment

cc: Merelyn Ceden, Senate Executive Assistant
Lori Hullings, Senate Executive Director
Kaixuan Ni, Vice Chair, Committee on Campus Community and Environment
Akos Rona-Tas, Senate Vice Chair

Office of the Academic Senate
Wayne & Gladys Valley Center for Vision
490 Illinois Street, 5th Floor
San Francisco, CA 94158
Campus Box 0764
academic.senate@ucsf.edu
<https://senate.ucsf.edu>

Errol Lobo, MD, PhD, Chair
Marta Margeta, MD, PhD, Vice Chair
Kartika Palar, PhD, MA, Secretary
Spencer Behr, MD, Parliamentarian

July 14, 2026

Ahmet Palazoglu
Chair, Academic Council
Systemwide Academic Senate
University of California Office of the President
1111 Franklin St., 12th Floor
Oakland, CA 94607-5200

**Re: UCSF Comments RE the Systemwide Review of Systemwide Policies
Applying to University of California Police Department (UCPD)**

Dear Chair Palazoglu:

Thank you for the opportunity to comment on the proposed Presidential Policy - Systemwide Policies Applying to University of California Police Department (UCPD). As we understand it, the policy would establish a systemwide framework defining the authority, coordination, and governance of the University of California (UC) Police Department (UCPD) across all UC campuses, thereby ensuring consistent policing standards, accountability, effective oversight, and collaborative protection of the University community. Overall, UCSF supports the University's efforts to modernize and consolidate these policies into a comprehensive systemwide framework and appreciates the substantial work that has gone into developing the proposed revisions. UCSF's Committee on Faculty Welfare (CFW), Rules & Jurisdiction (R&J), and the School of Medicine Faculty Council (SOMFC) commented on the proposed policy.

UCSF's operating environment differs from that of other UC campuses in several important respects. First, a large proportion of policing undertaken at UCSF takes place in the clinical environment, which includes hospitals, clinics, and other healthcare settings where officers routinely encounter patients and visitors whose behavior may be influenced by acute or chronic medical conditions, psychiatric illness, cognitive impairment, developmental disabilities, substance use disorders, dementia, or other health-related conditions. The SOMFC emphasized that the policy should therefore explicitly recognize these circumstances and promote appropriate consultation and coordination between law enforcement personnel and clinical teams when responding to situations involving patients whose behavior may be influenced by medical, psychiatric, cognitive, or substance use conditions.

Faculty reviewers devoted particular attention to the proposed *Use of Force* policy, with CFW and R&J encouraging additional clarification of several foundational concepts, including the definition of force, active resistance (CFW), non-compliance (CFW), de-escalation (CFW, R&J), proportionality (CFW), and objective reasonableness (CFW). Reviewers expressed concern that the proposed definition of force excludes certain physical control techniques that many readers would ordinarily understand to constitute force, and questioned whether this approach could create confusion regarding reporting, oversight, and accountability (R&J, CFW). Per above, these concerns are especially relevant in healthcare environments, where patients may be unable to recognize, communicate, or report pain or injury because of underlying medical, psychiatric, or cognitive conditions (R&J, SOMFC). Faculty also encouraged greater emphasis on crisis intervention, behavioral health responders, and co-response models when reasonably available and safe, as well as additional guidance regarding interactions with vulnerable populations, including minors, older adults, pregnant persons, individuals with disabilities, and persons experiencing

medical or behavioral health crises (CFW, SOMFC). Finally, reviewers encouraged additional clarification regarding the deadly force standard (CFW) and the use of force during demonstrations and crowd-management events (CFW), recognizing both the University's commitment to public safety and the importance of protecting constitutional rights.

Second, UCSF operates across multiple sites throughout San Francisco. Our footprint is therefore geographically distributed, which presents unique jurisdictional and operational considerations, including coordination with municipal and county law enforcement agencies across multiple sites. We encourage continued consideration of how the proposed policies governing jurisdiction and related operational matters will be implemented in a manner that preserves systemwide consistency while remaining responsive to UCSF's distributed healthcare environment (CFW).

R&J also identified a number of technical and drafting issues for consideration:

- *Terminology and defined terms*: Use consistent terminology throughout the policies (e.g., "The Regents of the University of California," "University of California," and "UCPD") and ensure that defined terms are used consistently.
- *Internal references and numbering*: Correct missing section numbers, outdated numbering, broken internal cross-references, and other citation errors throughout the document.
- *Supporting materials*: Include all referenced appendices and related policies—particularly the separate Firearms Policy—to permit complete review of interconnected policy provisions.
- *Internal consistency*: Clarify provisions where related sections may be interpreted inconsistently, including the relationship between the definitions of force and reporting requirements, the differing standards governing de-escalation, and cross-references between the Use of Force and Body-Worn Camera policies.
- *Editorial corrections*: Correct typographical, formatting, and drafting errors, including incomplete statutory quotations, omitted subsections, and other editorial inconsistencies identified during review.

Although primarily technical in nature, these revisions would substantially improve the clarity, internal consistency, and usability of the policy.

Thank you for considering our comments. If you have any questions, please reach out to me or the UCSF Executive Director, Todd Giedt (todd.giedt@ucsf.edu).

Sincerely,

Errol Lobo, MD, PhD, 2025-27 Chair
UCSF Academic Senate

Enclosures (3)

Cc: John Saucedo, Chair, Committee on Faculty Welfare
Irfan Kathiriya, Chair, Rules & Jurisdiction
Irum Khan, Chair, School of Medicine Faculty Council

Committee on Faculty Welfare
John Saucedo, PhD, MSc, MA Chair

July 7, 2026

Errol Lobo, MD
Division Chair
UCSF Academic Senate

Re: Systemwide Review of Systemwide Policies Applying to the University of California Police Department (UCPD)

The Committee on Faculty Welfare (CFW) writes to comment on the systemwide review of Policies Applying to the University of California Police Department (UCPD). CFW generally supports efforts to clarify and strengthen systemwide policing policies and offers the following comments and suggestions.

Use of Force

CFW recommends providing additional clarification for key terms used in the use-of-force policies, including “active resistance,” “non-compliance,” “de-escalation,” “proportionality,” and “objectively reasonable.” These terms play an important role in determining when force may be used, and clearer definitions would improve consistency, transparency, and understanding by members of the university community.

In particular, CFW encourages consideration of whether the definition of “active resistance” should more clearly distinguish between active resistance, passive resistance, verbal disagreement, and non-compliance. CFW suggests requiring an objectively observable physical act that impedes lawful control before categorizing conduct as active resistance.

CFW also noted that the current definition of “non-compliance” may not adequately distinguish refusal from an inability to comply due to disability, mental health crisis, language barriers, medical conditions, or cognitive impairment. Inability to comply with orders should not automatically be construed as resistance.

The committee notes that the definition of “objectively reasonable” relies heavily on the federal *Graham v. Connor* standard. While the policy incorporates California’s more recent use-of-force reforms in other sections, the committee encourages consideration of whether the policy would benefit from more explicitly connecting the concepts of necessity, de-escalation, and objective reasonableness to one another.

CFW also noted that the policy repeatedly references de-escalation and proportionality without clearly defining either concept. Providing definitions and examples may improve consistency in implementation and training.

CFW further requests clarification regarding the definition of “force.” The policy excludes activities such as escorting, handcuffing, restraining, searching, and certain passive-resistance

controls from the definition of force. Because injuries can occur during these interactions, CFW encourages clarification regarding whether such activities remain subject to supervisory review, documentation, and injury-reporting requirements.

As a health sciences campus, UCSF has a particular interest in how policing policies apply within hospitals, clinics, and other healthcare environments. CFW encourages consideration of whether additional operational guidance should be provided regarding interactions with vulnerable populations, including minors, elderly individuals, pregnant persons, individuals with disabilities, and individuals experiencing medical or behavioral health crises.

CFW also encourages consideration of stronger language regarding the use of crisis intervention personnel, behavioral health responders, and co-response teams when reasonably available and safe. This issue is particularly relevant in university and healthcare settings.

CFW discussed the policy provisions governing the use of deadly force against fleeing suspects. While CFW recognizes that these provisions largely reflect existing legal standards, the committee encourages consideration of whether additional clarification could be provided regarding the level of threat that must be present before deadly force is authorized.

Finally, given the University's recent experience with demonstrations, protests, encampments, and crowd-management situations, CFW encourages consideration of whether additional guidance should be provided regarding the use of force in these contexts, including supervisory oversight and protections for nonviolent demonstrators.

Oversight, Transparency, and Accountability

CFW encourages consideration of whether serious use-of-force incidents should undergo review by an entity independent from the involved chain of command. The proposed policy provides for supervisory and command review, but the committee believes there may be value in evaluating whether additional independent review mechanisms would strengthen public confidence and accountability.

CFW also encourages consideration of requiring public reporting of use-of-force data. While the policy requires annual analysis, it does not specify publication of the results. Public reporting of incidents, injuries, force types, and demographic trends may help advance transparency and accountability within the university community.

Relatedly, CFW recommends consideration of periodic reviews of force data to identify potential disparate impacts based on race, disability status, gender, or other protected characteristics. The policy references unbiased policing, but additional guidance regarding ongoing evaluation of force data may strengthen the University's commitment to equitable policing.

Governance and Applicability

CFW noted that personnel must comply with systemwide and campus-level policies unless a collective bargaining agreement provides otherwise. The committee recommends clarifying the extent to which collective bargaining agreements may modify or supersede provisions contained in the policy. CFW also encourages transparency regarding any policy provisions that may be affected by labor agreements so that members of the university community can better understand the practical effect of the policies and the extent to which collective bargaining agreements may alter or negate them.

CFW also discussed language stating that General Orders remain in effect until amended or canceled by the Chief of Police. While CFW understands the need for operational flexibility, the committee encourages consideration of whether additional safeguards, oversight mechanisms, or clarification would be appropriate to ensure transparency and consistency in the use of this authority.

Jurisdiction

CFW noted that the policy grants UC police officers broad jurisdiction across UC campuses and properties, as well as within one mile of campus boundaries. Members discussed the practical implications of this authority for UCSF, which operates across multiple sites throughout San Francisco. CFW encourages clarification regarding how this jurisdictional authority is intended to function in practice, particularly in areas where UC police authority overlaps with municipal and county law enforcement agencies.

Thank you for the opportunity to comment on this important review. Please contact me or our Senate analyst Kristie Tappan if you have questions regarding these comments.

Sincerely,

John Saucedo, PhD, MSc, MA
Committee on Faculty Welfare Chair

cc: Todd Giedt, Senate Executive Director
Alon Witztum, Committee on Faculty Welfare Vice Chair

Committee on Rules and Jurisdiction

Irfan Kathiriya, MD, PhD, Chair

July 9, 2026

Errol Lobo, MD, PhD
Division Chair
UCSF Academic Senate

Re: Policing Systemwide Review

Dear Chair Lobo:

The Committee on Rules and Jurisdiction (R&J) writes to comment on the Systemwide Review of Proposed Presidential Policy – Systemwide Policies Applying to University of California Police Department (UCPD).

R&J appreciates the extensive effort undertaken to comprehensively revise the University-wide Police Policies and Administrative Procedures. The policy addresses an important area of University operations and reflects a substantial review of existing practices. R&J's comments are organized according to the order of the proposed policy sections to facilitate review and consideration.

1. Section 1302 – Statutory Authority

R&J identified several drafting issues in this section.

Section 1302 refers to "The Regents" while other portions of the policy consistently use the full title, "The Regents of the University of California." R&J recommends using consistent terminology throughout the policy.

In Section 1302.1.2, the quotation formatting appears inconsistent. The quoted language should begin at the start of the statutory quotation rather than beginning partway through the provision.

2. Section 1305 – Personnel, Duties, and Responsibilities

R&J identified several issues involving defined terms, references, and internal consistency.

Section 1305.1.1 refers to "the University," but the term does not appear to be defined. Elsewhere, the policy uses the full name "University of California." R&J recommends consistent terminology throughout the document.

Similarly, references to "the department" should either consistently use the full department name or the defined abbreviation "UCPD."

Section 1305.1.5 references Appendix A-1, Law Enforcement Code of Ethics. R&J was unable to locate Appendix A-1 within the review materials. If the appendix is intended to be incorporated into the policy, it should be included as part of the review package.

Numbering Corrections

R&J identified instances in this section where references retain numbering from an earlier version of the policy. For example, the numbering before Section 1305.6.1 is "506" rather than a number that begins with 1305.6. Section 1305.7 references "section 505" rather than "section 1305.5" on News Media. R&J recommends a comprehensive review of internal references throughout the policy to ensure that all cross-references reflect the revised numbering structure and correspond to the correct policy sections.

3. Section 1309 – Uniform Specifications

There is a numbering gap in this section. The draft policy has a section numbered 1309.2.2.8 and then 1309.2.2.10. Section 1309.2.2.9 is missing. Similarly, the rank listing in section 1309.2.2.7 on Rank Insignia has a gap. The sequence proceeds from subsection (d) to subsection (f), suggesting that subsection (e) or an associated rank may have been omitted.

R&J also noted a potential conflict between Section 1309.1.2 and Section 1309.2.2.10. Section 1309.1.2 limits the number of accouterments that may be worn on the right pocket area to three. Section 1309.2.2.10 authorizes service and award pins above the right pocket flap. It was unclear to R&J whether award pins count toward the three accouterment limit. Insofar as this is a meaningful issue for UCPD, R&J recommends clarification.

Finally, R&J identified some typographical and formatting errors in this section and recommends a final editorial review in this section and others before finalizing. Here are the errors the committee identified.

- "Disposable **Lates**/Non-Latex Gloves" → should be "Disposable **Latex**/Non-Latex Gloves"
- "**Chief.** of Police" → extra period after "Chief" in the Campaign Hat section.
- "**boarding** the inner field" → likely should be "**bordering** the inner field"

4. Section 1311 – Use of Force

R&J devoted significant attention to the Use of Force section because it establishes standards governing some of the most consequential actions addressed by the policy.

Missing Materials (Firearms Policy)

R&J was unable to locate all materials referenced within the Use of Force policy and related policing policies. Several sections refer to a Firearms Policy, including provisions within the Use of Force, Uniform Specifications, and Vehicle Pursuits policies. However, R&J was unable to identify a corresponding Firearms Policy within the review materials. The tracked changes version of the Use of Force section strikes the section on firearms from the policy. R&J contacted the UCSF Police Department about this and was advised that the Firearms Policy will be a separate, stand-alone policy going forward. R&J recommends that review materials include references or links to closely related policies, such as the new Firearms Policy. R&J was concerned that important materials necessary to fully evaluate the proposed framework governing the use of force and firearms were not provided.

Definition of Force

R&J is concerned that the proposed definition of force excludes conduct that most people would ordinarily understand to be force. The definition, which is included below, excludes numerous physical techniques and tactics, including escorting, directing movement, handcuffing, restraining, searching, firm grip controls, wrist locks, and certain techniques used to overcome passive resistance, provided that the conduct does not result in visible injury or a complaint of injury. While the policy may have legitimate reasons for treating these actions differently for reporting or administrative purposes, R&J questions whether they should be excluded from the definition of force itself.

Force - The application of physical techniques or tactics, chemical agents, or weapons to another person, except in the following situations:

- a) When applying physical techniques or tactics to escort, direct movement, handcuff, restrain or search with no visible injury or complaint of injury to a compliant subject.*
- b) When applying a spit mask or spit hood on a subject to prevent spitting.*
- c) When applying a firm grip control (e.g., wrist lock or other control holds) that does not result in injury, the appearance of injury, or complaint of injury (e.g., the use of a grip to control a person's hands while searching or handcuffing)*
- d) When applying the use of physical techniques or tactics to assist an intoxicated person or a person with a physical disability that does not result in the appearance of injury, or complaint of injury (e.g., lifting an intoxicated person to a standing position).*
- e) When applying physical techniques on a subject who is non-compliant exhibiting passive resistance (e.g., includes subjects who remain in a sitting, standing, or limp or prone positions without holding on to fixed objects or other persons in an attempt to delay or resist arrest).*

The committee is concerned that the proposed definition and its arguably counterintuitive exclusions will create confusion for officers, supervisors, members of the public, and others who must interpret and apply the policy. For example, a wrist lock, control hold, or physical restraint would commonly be understood as a use of force. A reader may therefore find it difficult to reconcile the policy's definition of force with conduct that plainly involves physical control of another person. R&J is concerned that the policy could create situations in which an officer has clearly applied physical force, but the policy nevertheless concludes that no force occurred because the conduct falls within one of the listed exceptions.

R&J is also concerned that several exceptions depend on whether a person exhibits visible injury or complains of injury. This framework makes the classification of an officer's conduct depend not only on what the officer did, but also on how the subject responds. The same physical technique could be classified as force in one encounter but not another depending upon whether a complaint is made or an injury is observed. R&J questions whether injury and reporting thresholds should determine whether conduct is classified as force in the first instance.

These concerns are particularly significant in the UCSF environment. University police officers frequently interact with patients and other individuals who may have medical conditions, cognitive impairments, communication limitations, altered mental status, developmental

disabilities, dementia, intoxication, or other circumstances that affect their ability to recognize, communicate, or report pain and injury. In these settings, the absence of a complaint may not be a reliable indicator that force was not experienced or that discomfort, pain, or injury did not occur.

R&J recognizes that the University may wish to distinguish between different categories of force and may not intend for every physical interaction to trigger the same reporting, documentation, or review requirements. This could be achieved by defining different categories of force and creating different reporting requirements for each category. R&J recommends reconsidering whether the current approach of excluding certain types of force from the definition of force appropriately balances creating reasonable reporting requirements with maintaining a definition of force that is intuitive, consistent, and readily understood by officers and the communities they serve.

Consistency of De-Escalation Standards

R&J identified several instances within the de-escalation provisions where different standards are used to guide officer conduct, including phrases such as "whenever possible" (Policy Summary), "when feasible" (Section 1311.3.1), "when reasonable" (Section 1311.2.1), and "as time and circumstances reasonably permit" (Section 1311.3.1). These standards do not necessarily convey the same meaning and may be interpreted differently by officers, supervisors, trainers, investigators, and reviewers.

R&J is not recommending a particular standard; however, R&J notes that "as time and circumstances reasonably permit" does not seem consistent with the higher standard of "when feasible" that is set by state law and may not be consistent with the expectations of the UC community. R&J recommends that the policy either explain the intended distinction between these standards or use more consistent terminology if no distinction is intended. Clarifying the applicable standard would promote consistent implementation of the policy's de-escalation expectations.

Deadly Force Provisions

R&J identified an apparent drafting error within Section 1311.4(a). The subsection currently states that an officer may use deadly force to protect themselves or others from what "reasonably believes a is an imminent threat of death or serious bodily injury." The language is incomplete and likely has both missing and unnecessary words. Because Section 1311.4 governs the circumstances under which deadly force may be used, R&J recommends correcting this provision and reviewing the remainder of the section to ensure that all language accurately reflects the intended policy standards.

Relationship to Body-Worn Cameras

R&J recommends adding a direct cross-reference between the Use of Force policy and the Body-Worn Camera policy. Body-worn camera recordings frequently play an important role in use-of-force reviews, investigations, training, and accountability processes. Explicitly linking these policy sections would improve clarity and help ensure consistent implementation across campuses.

5. Section 1319 – Body-Worn Cameras

R&J recommends providing additional clarity regarding the circumstances in which body-worn cameras must be activated. Clear activation standards would promote consistency,

accountability, and effective review of officer interactions. The policy would benefit from more explicit guidance regarding circumstances in which recording is expected, required, or subject to exceptions. Clear activation standards promote accountability, consistency, and public confidence while reducing ambiguity for officers and supervisors.

6. Section 1320 – Military Equipment

Section 1320.3(d) references the "University of California Irvine Police Department." Because this is a systemwide policy, the reference appears inconsistent with the remainder of the document and may be a drafting artifact from an earlier template. R&J recommends reviewing and correcting this language.

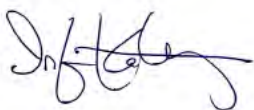
R&J also noted references to administrative responsibilities and training functions that would benefit from additional clarification. Specifically, the policy should clearly identify responsible parties and oversight mechanisms where training and compliance obligations are imposed.

Conclusion

R&J appreciates the substantial work that has gone into modernizing the University's policing policies. The committee's comments primarily focus on improving clarity, consistency, internal references, and alignment between related policy provisions. R&J believes these revisions would strengthen the policy and facilitate consistent implementation across the University.

Thank you for the opportunity to review and comment on this important policy. Please contact me or our committee analyst, Kristie Tappan (kristie.tappan@ucsf.edu) if there are questions about R&J's comments.

Sincerely,



Irfan Kathiriya, MD, PhD
Committee on Rules and Jurisdiction Chair

cc Todd Giedt, UCSF Academic Senate Executive Director
 Kristie Tappan, UCSF Academic Senate Senior Public Policy Analyst
 Anthony Baker, UCSF Academic Senate Rules and Jurisdiction Committee Vice Chair

School of Medicine Faculty Council
Irum Khan, MBBS, PhD, Chair

July 7, 2026

Errol Lobo, M.D.
Division Chair
UCSF Academic Senate

Re: Policing Systemwide Review

Dear Chair Lobo:

The School of Medicine Faculty Council (SOMFC) reviewed the proposed Presidential Policy applying to University of California Police Departments at its June 18, 2026 meeting. The Council appreciates the opportunity to provide feedback and recognizes the importance of establishing clear and consistent systemwide guidance for University of California Police Departments.

The Council did not reach consensus on specific recommendations for changes to the proposed policy. However, members raised several questions and concerns that they believe warrant consideration as the policy review moves forward.

A central theme of the discussion was the interaction between law enforcement activities and clinical environments. Faculty members noted that many situations encountered at UC health facilities involve individuals whose behavior may be influenced by medical conditions, psychiatric illness, substance use disorders, cognitive impairment, or other health-related factors. Members emphasized the importance of ensuring that policies governing police interactions in healthcare settings recognize these complexities and encourage close collaboration between law enforcement personnel and clinical teams whenever possible.

Related to this concern, members discussed whether the proposed policy provides sufficient guidance regarding situations in which patient behavior may appear threatening or disruptive but is substantially influenced by an underlying medical or behavioral health condition. Faculty expressed interest in understanding how the policy will support appropriate de-escalation, clinical consultation, and coordinated responses in these circumstances. The relevant language from the proposed policy follows.

Use of Force

1311.6 MEDICAL CONSIDERATIONS

Once it is reasonably safe to do so, properly trained officers should promptly provide or procure medical assistance for any person injured or claiming to have been injured in a use of force incident (Government Code § 7286(b)(15)).

Medical assistance shall be rendered as quickly as reasonably possible for any person who exhibits signs of physical distress, who has sustained visible injury, expresses a complaint of injury or continuing pain, or who was rendered unconscious following a use of force. Any individual exhibiting signs of physical distress after an encounter should be continuously monitored until the individual can be medically assessed.

Persons who exhibit extreme agitation, violent irrational behavior accompanied by profuse sweating, extraordinary strength beyond their physical characteristics, and imperviousness to pain, or who require a protracted physical encounter with multiple officers to be brought under control, may be at an increased risk of sudden death. Calls involving these persons should be considered medical emergencies. Officers who reasonably suspect a medical emergency should request medical assistance as soon as practicable and have medical personnel stage away if appropriate.

Based upon the officer's initial assessment of the nature and extent of the subject's injuries or medical condition medical assistance may consist of examination by fire personnel, paramedics, hospital staff, or medical staff at the jail. If any such individual refuses medical attention, such a refusal shall be fully documented in related reports and, whenever practicable, should be witnessed by another officer and/or medical personnel. If a recording is made of the contact or an interview with the individual, any refusal should be included in the recording, if possible.

The on-scene supervisor or, if the on-scene supervisor is not available, the primary handling officer shall ensure that any person providing medical care or receiving custody of a person following any use of force is informed that the person was subjected to force. This notification shall include a description of the force used and any other circumstances the officer reasonably believes would be potential safety or medical risks to the subject (e.g., prolonged struggle, extreme agitation, impaired respiration).

See the Medical Aid and Response Policy for additional guidelines

The Council also discussed broader questions regarding the role of law enforcement within healthcare settings. Members recognized the need to maintain safe clinical environments for patients, visitors, learners, and employees while also acknowledging longstanding concerns about over-policing and the potential unintended consequences of law enforcement involvement in healthcare environments. Several members noted the importance of balancing safety objectives with UCSF's commitments to equity, inclusion, and compassionate care for vulnerable populations.

Faculty also expressed interest in understanding how the proposed policy will interact with existing local practices and partnerships at the various UC campuses and affiliated clinical sites. Because UCSF operates across multiple settings with differing security structures and patient populations, members were interested in how the policy will be implemented in a manner that remains responsive to local circumstances while preserving systemwide consistency.

Finally, the Council encouraged continued attention to transparency, communication, and training. Members noted that policies governing police interactions are most effective when faculty, staff, trainees, and patients understand the relevant procedures, expectations, and available resources.

The Council encourages the University to ensure that the policy explicitly recognizes the unique circumstances of healthcare environments and promotes appropriate consultation and coordination between law enforcement personnel and clinical teams when responding to situations involving patients whose behavior may be influenced by medical, psychiatric, cognitive, or substance use conditions.

The School of Medicine Faculty Council appreciates the opportunity to provide these comments and thanks the Academic Senate leadership for facilitating faculty review of this important policy.

Sincerely,

Irum Khan
School of Medicine Faculty Council Chair

cc: Todd Giedt, UCSF Academic Senate Executive Director
Kristie Tappan, UCSF Academic Senate Analyst
Cynthia Gasper, UCSF School of Medicine Faculty Council Vice Chair



UC SANTA BARBARA

Academic Senate
Rita Raley, Chair
Shasta Delp, Executive Director

1233 Girvetz Hall
Santa Barbara, CA 93106-3050
<http://www.senate.ucsb.edu>

July 13, 2026

To: Ahmet Palazoglu, Chair
Academic Senate

From: Rita Raley, Divisional Chair
Academic Senate

A handwritten signature in blue ink, appearing to read "R. Raley", is placed next to the "From:" line.

Re: Proposed Presidential Policies Applying to University of California Police Departments (UCPD)

The Santa Barbara Division distributed Proposed Presidential Policies Applying to University of California Police Departments (UCPD) to the Council on Faculty Welfare, Academic Freedom and Awards (CFW), the Undergraduate Council (UgC), the Graduate Council (GC), the Council on Planning and Budget (CPB), the Committee on Privilege and Tenure (P&T), the Charges Advisory Committee (CAC), the Committee on Diversity and Equity (CDE), the Committee on International Education (CIE), and the Faculty Executive Committees (FECs) for the College of Letters and Science (L&S), the College of Engineering (COE), the College of Creative Studies (CCS), the Gevirtz Graduate School of Education (EDUC), and the Bren School of Environmental Science and Management (BREN). CPB, CAC, P&T, and the L&S, CCS, and BREN FECs elected not to comment. COE and UgC declined to offer a formal opinion due to a lack of expertise or necessary context.

Of the bodies that responded, four provided substantive feedback (CFW, GC, CDE, CIE), highlighting significant concerns regarding academic freedom, shared governance, the use of force, jurisdiction, and the inclusivity of the review process.

Academic Freedom and Expression

CFW emphasized that the proposed policies fail to explicitly align with University principles on academic freedom. They warned that current language regarding surveillance, information gathering, and "conspiracy" investigations could have a chilling effect on protected expression, including union strikes and political protests. The committee recommends clarifying that the right to assemble and protest remains protected even when activities are boisterous or impede normal operations, provided they do not incite violence.

Shared Governance and Civilian Oversight

Multiple committees (CFW, CDE) objected to the concentration of authority within police leadership, specifically regarding Special Response Team (SRT) candidate selection and the deployment of specialized equipment. They argue that decisions on force and personnel should require proactive consultation with civilian authorities (such as the Chancellor or Police

Accountability Boards). Recommendations include mandating civilian approval for the use of chemical agents or kinetic projectiles and subjecting SRT selections to community feedback.

Use of Force and Equipment

Concerns were raised across CFW, GC, and CIE regarding the potential escalation of force. GC noted that recent language changes regarding the treatment of arrestees appear to weaken previous prohibitions on striking suspects. Furthermore, CFW and CIE jointly opposed the acquisition and deployment of military-grade equipment, arguing it creates an intimidating environment that disproportionately impacts marginalized and international students. Both groups recommend strict prohibitions on using such equipment during peaceful demonstrations.

Jurisdiction and Local Context

CFW and CDE raised concerns regarding the intersection of UCPD policies with local municipal jurisdictions and mutual aid agreements. They recommend that visiting officers receive mandatory briefings on local campus culture and de-escalation protocols to prevent inappropriate tactical responses.

Process, Transparency, and Inclusivity

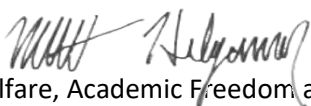
Committees criticized the review process for lacking transparency and student engagement. CDE and GC highlighted that the open comment period yielded minimal responses, questioning the distribution method and the exclusion of student representatives during the end of the academic year. Additionally, CIE noted the document's poor organization—particularly the absence of a clear table of contents—hinders understanding for international students. Collectively, these bodies call for a more robust, inclusive solicitation of student comments and improved document accessibility.

All of the agencies' individual responses are attached for consideration. We appreciate the opportunity to comment.

UNIVERSITY OF CALIFORNIA
ACADEMIC SENATE
SANTA BARBARA DIVISION
Council on Faculty Welfare, Academic Freedom & Awards

June 18, 2026

To: Rita Raley, Divisional Chair
Academic Senate

From: Matt Helgeson, Chair 
Council on Faculty Welfare, Academic Freedom and Awards

Re: Systemwide Review of Proposed Presidential Policies Applying to University of California Police Department

The Council on Faculty Welfare, Academic Freedom and Awards (CFW) has reviewed the proposed Presidential Policies Applying to the University of California Police Department, otherwise known as “the Gold Book”. Before proceeding to specific responses to the proposed policy, Council wishes to acknowledge the important role that university police departments play in protecting the safety and security of campus communities, and express gratitude to UCPDs in fulfilling this role. It is also important to emphasize that the de facto operational role of UCPDs extends well beyond a law enforcement capacity. This distinguishes the University from other jurisdictions in several ways that require careful consideration when crafting policies regarding policing and law enforcement¹.

Council’s review of the Gold Book proposal was conducted by assessing the various policy proposals in relation to several key principles and policies on which the University, and academia more broadly, is founded. Below, we affirm these core principles, identify specific items in the policy that presented

1 Council’s opinions are informed by a wealth of recent research and resulting policy recommendations on the intersectionality between university communities, academic freedom and campus policing, which is summarized in the following references and texts:

“On Campus Police Forces”, American Association of University Professors, April 2021.

https://www.aaup.org/sites/default/files/AAUP_On_Campus_Police_Forces_report.pdf

“On Title VI, Discrimination, and Academic Freedom”, American Association of University Professors, September 2025. <https://www.aaup.org/sites/default/files/2025-09/TREP-On-Title-VI-September-2025.pdf>

“Open Letter to College and University Presidents on Student Protests”, American Civil Liberties Union, April 26, 2024. <https://www.aclu.org/documents/open-letter-to-college-and-university-presidents-on-student-protests>

“Joint Letter to Universities and Colleges: Protect the Right to Protest on Campus”, American Civil Liberties Union, Human Rights Watch and Amnesty International, October 31, 2024. <https://www.aclu.org/documents/letter-to-universities-student-protesters>

issues or questions in relation to them, and provide recommendations for revisions to either clarify or amend the policy to better align with them.

1. Academic freedom. Principles of academic freedom are central to the mission and function of the University, extend to all of its academic staff and students, and are codified by official university policy (for example, APM - 10). Gold Book policies should therefore align with University policies on academic freedom, particularly APM-10, in guiding relevant UCPD policy, decisions and actions. In doing so, Council recommends that it is useful to view academic freedom through two lenses:

(i) Academic freedom is both a personal liberty and an academic responsibility. According to APM-10, members of the university are free “to express the widest range of viewpoints in accord with the standards of scholarly inquiry and professional ethic”. It is important to emphasize that academic freedom augments, and is distinct from, Constitutional freedoms of expression. As such, Gold Book policies, particularly as they relate to police intervention in public assemblies or demonstrations, should reflect this distinction, even and especially in cases where ethically expressed viewpoints of individuals are in conflict with the viewpoints or interests of the University.

(ii) Academic freedom is an essential asset for the core functions of the University. This is because free and scholarly inquiry and debate serves as the foundation for the University’s reputation, for its intellectual property, and for the value of higher education as a public good. As a result, academic freedom is an intangible asset that should be protected, just as the more tangible properties and assets of the University should be protected if and when their security comes under threat.

Below is a summary of policy items that Council suggests be revised or clarified in order to align with University policy and principles on academic freedom.

1316 – Crowd & Demonstration Management - Nelson Lichtenstein

- **Passage (Section 1316.3):** “Knowledge of law and University policies as they relate to use of force and information gathering.”
- **Issue:** This list should explicitly acknowledge academic freedom policies and principles. UCPD officers should be aware of University policies regarding academic freedom, understand how they augment Constitutional freedoms, and incorporate them in principles of crowd management (both with respect to protecting individuals’ academic freedom, and also protecting exercises of academic freedom as an asset of the university).
- **Recommended revision:** An additional bullet point should be added: “**Knowledge of University policies as they relate to academic freedom.**”
- **Passage (Sections 1316.11 and 1316.12):** On page 11 “Information Gathering and Assessment” this subsection asserts the “rights of persons to lawfully assemble and express their opinions,” but under the subsection “Incident Documentation” the report calls for the police to photograph, videotape and otherwise surveil the crowd and the individuals within it.
- **Issue:** There is consensus research demonstrating that surveillance and documentation of lawful activity have a measurable chilling impact on the tendency of individuals to express their Constitutional rights to gather, speak out, and carry signs and banners.

- **Recommended revision:** Given the chilling effect on expressive activities, the policy should make clear that such surveillance must be justifiably linked to suspected criminal activity.
- **Passage (Section 1316.14):** The report asserts that “arrests should be based upon applicable laws and advice from prosecutors,” but also raises and seemingly encourages “conspiracy charges,” which are “sometimes overlooked.” In the very next sentence, the draft policy seems to indicate that students may be an exception to this policy: “Student conduct violations should be documented and reported to student affairs administrators.” Confusing the issue still more, the draft says that among other things, “investigative considerations” may include “recording specific chants with nexus to unlawful activity and when possible, identifying who is leading them.” The policy then instructs that in “conspiracy investigations”, manifestos, posts on social media, clothing and items “showing affiliation with similar groups” should be noted or collected.
- **Issue:** Firstly, the policy must make clear what activities can/should be protected based on academic freedom principles and policies, not only for students, but additionally all academic appointees of the University who also enjoy academic freedom protections under APM-10. Second, a clear example of campus activity that should be more clearly contemplated by the policy is union strike and picket line activity. Such activity should be explicitly addressed by the policy, since at this time more than 80% of university employees are unionized, and union strike activity comprises a significant fraction of crowd and demonstration activity on campuses at the current time. Strikes are explicitly designed to disrupt the normal operations of the university, yet are allowed under University policy. However, since they are most definitely conspiracies composed of several people, it would be easy for the policy or university administrators to declare them unlawful assemblies. Indeed, on page 16 of the policy, in the subsection labeled “dispersal orders”, unlawful assembly is defined as set forth in Penal Code §407 and the courts, as characterized by “boisterous” and “tumultuous” activity that “poses a clear and present danger of imminent violence.” Picket lines are designed to be boisterous and even tumultuous, and for centuries police, courts, legislators, workers, and managers have debated whether a picket line designed to prevent the physical passage of non-strikers constitutes “imminent violence.”
- **Recommended revision:** The policy should be revised to more clearly assert what activities are protected as expressions of academic freedom, or as lawful organized labor activities. In particular, this section should be amended to make clear that in labor disputes – and other politically motivated manifestations – the right to picket and verbally protest is respected by the University, even when boisterous and when such activities impede the normal operations of the University.

2. Shared governance. Because the Academic Senate holds jurisdiction over the academic functions of the university, as well as acting in defense of academic freedom, it is important that the Academic Senate be an informed and proactive stakeholder in matters where changes to UCPD policy or resources may affect the protection of academic personnel, resources and instruction. Currently, this role is fulfilled by a combination of campus administrators, the Academic Senate, the Police Accountability Boards (PABs). In Council’s view, the Gold Book Policies do not sufficiently codify or emphasize the role of these bodies in guiding UCPD policy and decision making. For example, the small number of times PABs are mentioned primarily indicate a retrospective role – with reporting and review functions

occurring only after a complaint is filed, after an internal investigation is performed, etc. In Council's view, such retrospective consultation does not fulfill the Gold Book's own stated goal (on page 3 of Section 1314) to "promote accountability, trust, and communication" between UC campus communities and UCPDs – achieving this goal also requires broader *proactive* consultation between UCPDs and campus stakeholders.

Below is a summary of policy items that Council suggests be revised or clarified in order to achieve more proactive collaboration between UCPDs and campus stakeholders (including PABs) in the spirit of shared governance.

1315.12 - Vehicle Pursuits

- **Passage:** "The Chief of Police shall direct an annual documented review and analysis of department vehicle pursuits to minimally include policy suitability, policy compliance, and training or equipment needs."
- **Issue:** There is no indication whether vehicle pursuit reports will be disclosed publicly. Given the potential collateral risk to the campus community, vehicle pursuits reports should be provided to the campus PAB.
- **Recommendation:** "The Chief of Police shall direct an annual documented review and analysis of department vehicle pursuits to minimally include policy suitability, policy compliance, and training or equipment needs, **and will provide a summary of the review to the relevant Police Accountability Board.**"

1316 - Crowd & Demonstration Management

- **Passage:** Throughout, but particularly sections 1316.5, 1316.6, 1316.13 and 1316.16.
- **Issue:** It is not clear whether UCPD themselves or a separate authority (courts, University administrators, local officials) are in control of decision making and the incident command structure. For example, on page 15, the subsection of "Crowd Management, Intervention, and Control Strategies," reads "Every event should be independently assessed to determine the tactics that will effectively support and facilitate First Amendment activity and provide for public safety." Who is responsible for making such assessments and decisions? This is rather important because the following subsections "Dispersal Orders" and "Mass Arrests and Bookings" describe massive, highly coordinated interventions. Notably, University administrators are absent from the list under "Coordination with". Police discretion in such matters must be clearly constrained and subject to civil authority. Such intervention should be rare and only used in extreme circumstances where there is consensus across law enforcement and civilian authorities that it is necessary.
- **Recommendation:** Section 1316.00 should be revised to make clear what parties within the incident command structure should be in charge of what decisions and declarations regarding crowd management, intervention and control. Wherever possible (except in cases of an immediate, active, and life-threatening situation), these procedures should involve approval by a civilian office, such as the Chancellor or their designee.

1317.4.3 - SRT Sergeants and Officers.

- **Passage (Page 5 of 10. Line 19):** "SRT candidates will be selected by the SRT members' campus Chief of Police and command staff. ... The process should include a command-level review of the applicant's qualifications, a supervisory recommendation, and a review of the SRT applicants' performance evaluations."
- **Issue:** The policy grants sole authority over who joins these specialized, high-impact teams to police leadership, completely bypassing campus community input. Because the selection, review, and final approval rest entirely with the individual campus Chiefs, there is no mechanism for campus stakeholders to provide input or oversight.
- **Recommendation:** Update section 1317.4.3 to include community stakeholders:
*"SRT candidates will be selected by the SRT members' campus Chief of Police and command staff, **subject to review and feedback from the Police Advisory Board.**"*

1317.6.2 - Deployment of Equipment.

- **Passage:** "This includes those items deemed to be military equipment, denoted in Government Code section 7071 and approved by the UC Regents."
- **Issue:** The explicit authorization of military-grade equipment can create an intimidating and heavily militarized campus environment. This often disproportionately impacts the psychological safety of marginalized student populations and can escalate tensions during otherwise peaceful demonstrations.
- **Recommended revision:**
"While certain specialized tools are categorized as 'military equipment' under Government Code section 7071 for transparency and reporting purposes, the University is committed to maintaining a non-intimidating campus environment. The deployment of such equipment is strictly restricted to high-risk, life-safety emergencies and is prohibited for routine crowd management or peaceful demonstrations to prevent the unnecessary militarization of the university campus."
- **Passage:** "Deployment of SRT equipment includes, but is not limited to: (a) Weapons: (1) Authorized kinetic energy weapons/projectiles (2) Authorized chemical agents".
- **Issue:** The use of chemical agents (such as tear gas or pepper spray) and kinetic projectiles (such as rubber bullets) on a university campus is highly controversial. Deploying these weapons against the UCSB community could result in severe physical injury and lasting psychological trauma, fundamentally damaging the trust between the student body and the administration.
- **Recommended Amendment:** Update section 1317.6.2 to include:
"The deployment of chemical agents and kinetic energy projectiles is strictly prohibited during peaceful demonstrations or non-violent civil disobedience. These tools may only be authorized when there is an imminent threat of severe bodily injury or death, and only after all standard de-escalation tactics have been exhausted and documented."

1317.6.3 - Discretion of Host Campus Chief

- **Passage (Page 9 of 10. Line -15):** "The use of SRT weapons will remain at the discretion of the host campus Chief or designee."

- **Issue:** Placing the sole discretion for the use of chemical agents or kinetic projectiles on the campus Chief of Police (or their designee) means the safety of the UCSB community during a protest hinges on the judgment of one individual.
- **Recommendation:** Update section 1317.6.3 to mandate administrative oversight: *"The use of SRT weapons will remain at the discretion of the host campus Chief or designee, **but only after attempts for direct consultation with the campus Chancellor or their designated civilian administrative representative prior to deployment, except in cases of immediate, active, life-threatening emergencies.**"*

1317.7 - Incident Command System

- **Passage** (Page 9 of 10 (line 3): "The host campus is responsible for... submitting the after-action reports... to the SRT Chiefs' Liaison or Regional Coordinator within thirty days".
- **Issue:** While after-action reports are required, they are primarily internal to police leadership. Without public or administrative transparency, the UCSB community cannot verify if the SRT acted according to policy or if civil rights were truly protected.
- **Recommended revision:** "The host *campus* is responsible for... submitting the after-action reports... **A public version of this report, excluding sensitive tactical information but including a full accounting of all force used and its justification, shall be presented to the campus Chancellor and the public within 60 days of the deployment.**"

1318.00 - Systemwide UCPD Mutual AID

- **Passage** (Page 2/8 , Section I. Policy Summary): "Host campuses cover reimbursement for overtime, travel, and other extraordinary costs, ensuring fairness and accountability."
- **Issue:** Large-scale mutual aid deployments can result in massive, unplanned expenditures that drain funds from other UCSB student services or academic programs.
- **Recommended revision:** "Host campuses cover reimbursement... **The host campus Chief of Police must provide a preliminary cost estimate to the campus budget office and the Chancellor's office within 48 hours of the request to ensure fiscal transparency and resource management.**"

1318.02 - Requesting Mutual Aid

- **Passage** (Page 2/8. Section II (a)): "Requests for mutual aid will be made by the Chief of Police of the host campus, directly to the Chiefs of Police of other campuses."
- **Issue:** This bypasses the Chancellor and campus stakeholders, potentially escalating situations in which the administration might prefer to handle through de-escalation or student affairs interventions.
- **Recommended revision:** "Requests for mutual aid will be made by the Chief of Police of the host campus **only after consultation with and written approval from the campus Chancellor (or their civilian designee), except in cases of an immediate, active threat to life where such consultation is not feasible.**"

1318.13 - Reporting Mutual Aid.

- **Passage** (Page 8/8): "Upon termination of a mutual aid incident, the host campus will forward a written report... to the Chair of the Council of Chiefs summarizing the extent of the assistance provided..."
- **Issue:** This creates a transparency gap. The UCSB community (students, faculty, and staff) has no formal right to see how many outside officers were on their campus or what actions they took.
- **Recommended revision:** "Upon termination of a mutual aid incident, the host campus will forward a written report... to the Chair of the Council of Chiefs **and the campus's community safety oversight board. A redacted version of this summary, including the number of personnel and a summary of actions taken, shall be made available to the public on the department's website within 60 days.**"

1320 – Military Equipment

- **Passage:** The entire section, particularly Section 1320.5.
- **Issue:** In Council's view, given that a non-negligible fraction UCPD use of force actions involve UC affiliates, there is considerable risk to the University and its stakeholders by acquiring, holding, and potentially deploying military equipment. As such, acquisitions should be subject to consultative review and approval by campus stakeholders.
- **Recommended revision:** The section should be revised to make the acquisition of military equipment by UCPDs explicitly contingent upon consultative review and approval by campus civilian authorities, to include the Chancellor or their designee and/or the Police Accountability Board.

3. The delocalized setting of the University. Although the jurisdiction of UCPDs is typically limited by geographic campus boundaries, this boundary is diffuse and highly porous, with University personnel and activity often extending in an official capacity beyond the campus into the surrounding municipal jurisdictions. As a result, this raises a number of important challenges and questions regarding the intersection of UCPD jurisdiction and policies with those of surrounding jurisdictions. Below is a summary of policy items that Council suggests be revised or clarified in order to better clarify this intersectionality.

1315.3 – Vehicle Pursuits

- **Passage:** "Officers who have received appropriate training are authorized to initiate a vehicle pursuit when **the need to apprehend a fleeing suspect** clearly outweighs the risks a vehicle pursuit poses for officers and the public.
- **Issue:** There is no clearly identified threshold for what constitutes a reasonable "need to apprehend" for initiating a pursuit. Given the potential collateral risks to public safety of a vehicle pursuit, this should be clarified.
- **Recommendation:** Revise item (a) to more clearly indicate what crimes fall above the threshold to justify a vehicle pursuit.

1317.3.2 - Supervision and Command Page 4 of 10. Line -10

- **Passage** (Page 4 of 10. Line -10): "Upon arrival to the host campus, the SRT Regional Coordinator or Commander should report directly to the host campus Chief of Police or designee for assignment and instructions".
- **Issue:** Outside officers from other Southern California campuses may not understand UCSB's unique relationship with Isla Vista or local de-escalation protocols, leading to inappropriate tactical responses.
- **Recommended revision:** "Upon arrival to the host campus... **the host campus shall provide a mandatory briefing to all guest SRT members regarding local campus culture, specific de-escalation expectations, and identified sensitive areas (e.g., student housing, basic needs centers) to ensure a culturally competent response.**"

1317.7 - INCIDENT COMMAND SYSTEM

- **Passage** (Page 9 of 10, Line -7) : "During an SRT call-out and prior to the team's arrival, the host agency is expected to manage the response to critical incidents using the principles of the Incident Command System.".
- **Issue:** Ensure that when squads from other UC campuses arrive, they do not blindly apply force without understanding UCSB's specific campus climate, student culture, and physical environment.
- **Recommended revision:** Add a new clause under 1317.7 (Incident Command System): *"Upon arrival to the host campus, and prior to any field deployment, **all responding SRT members must receive a mandatory, campus-specific briefing. This briefing must cover local student dynamics, specific de-escalation protocols relevant to the host campus, and explicit limitations on force as directed by the host administration.**"*

1318.00 - Systemwide UCPD Mutual Aid

- **Passage started on Page 2/8 (Section I, Policy summary):** "Guest campuses provide officers and equipment when available, while the host campus assumes command and responsibility..."
- **Issue:** Officers from other UC campuses (e.g., UC Davis or UC Berkeley) may lack familiarity with UCSB-specific de-escalation practices or the specific physical layout of Isla Vista, leading to misunderstandings or unnecessary escalations with students."
- **Recommended Amendment (Add to 1318.07 on Page 6 or 1318.12 on Page 7):** "All guest personnel arriving at the host campus must receive a mandatory 'Local Context Briefing' from the host campus personnel. This briefing shall include campus-specific de-escalation expectations, local community dynamics, and identified 'safe zones' for student expression."

1318.08 - Supervision and Arrest Procedures

- **Passage** (Page 6/8) "Whenever possible, sworn officers from the host campus shall make any necessary arrests in order to avoid court appearances by mutual aid personnel."
- **Issue:** The phrase "whenever possible" provides a large loophole. If a guest officer from a distant campus arrests a UCSB student, it becomes much harder for the student to seek accountability

or for the university to provide consistent follow-up, as the officer is not part of the local community.

- **Recommended revision: "Sworn officers from the host campus shall make all necessary arrests. Guest officers may only perform an arrest if a host campus officer is not present and there is an immediate threat of harm. In such cases, the guest officer must immediately transfer custody to a host campus officer as soon as practicable."**

Although we have above highlighted a number of policies and passages that present specific issues that should be clarified, the length of the policy as well as a lack of certain relevant domain expertise on Council prevents a comprehensive review at the present time. As such, we recommend that every section of the Gold Book policy receive a thorough review by domain experts against its ability to uphold and protect the three core tenants and facets of the University we focus on above.

CC: Shasta Delp, Executive Director, Academic Senate

**Academic Senate
Santa Barbara Division**

June 3, 2026

To: Rita Raley, Divisional Chair
Academic Senate

From: Joe McFadden, Chair
Graduate Council



Re: Systemwide Review of Proposed Presidential Policies Applying to University of California Police Department (UCPD)

At its meeting of June 1, 2026, Graduate Council reviewed the Proposed Presidential Policies Applying to University of California Police Department (UCPD) and has the following comments.

The Council is concerned about some of the language changes in the document that signal a potential shift in police posture.

For example, in section 1312.2.3 Treatment of Arrestees and Suspects., the policy now reads: *Arrestees and suspects shall be treated in a humane manner as provided by law. They shall not be subject to the use of force except as prescribed by UCPD policy and the law. No officer shall verbally abuse arrestees or suspects.*

The policy previously read: *Arrestees and suspects shall be treated in a humane manner as provided by law. They shall not be subject to physical force except as required to subdue violence or ensure detention. No officer shall strike an arrestee or suspect except in self-defense, to prevent an escape, or to prevent injury to another person.*

The original language makes it clear that force can only be used to prevent violence. Also, the line that prevents an officer from striking an arrestee has been removed. This is a clear watering down of the policy language and is concerning.

The Council would like to know if students, both graduate and undergraduate, were given the opportunity to review and comment on this proposal. Policies of this nature affect the student body more so than any other member of campus. UC students have been subjected to much violence, including police violence, over recent years. For example, the UC system is still dealing with the ramifications surrounding the violence at UCLA during protests against the war in Gaza. If students were not asked to comment, the Council requests a formal process be created to solicit comments from the student body.

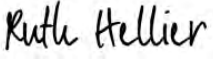
The Council would also like to emphasize that de-escalation and protection should still be the highest priorities of the UC Police. At student protests, the job of the police is to protect the students from those not from campus, and to de-escalate any violence.

CC: Shasta Delp, Executive Director, Academic Senate

**Academic Senate
Santa Barbara Division**

June 5, 2026

To: Rita Raley, Divisional Chair
Academic Senate

From: Ruth Hellier, Chair
Committee on Diversity & Equity 

Re: Systemwide Review of Proposed Presidential Policies Applying to University of California Police Department (UCPD)

At its meeting of June 1, 2026, the Committee reviewed the Proposed Presidential Policies Applying to University of California Police Department (UCPD), and has the following comments.

First, the cover letter states that only one response was received after an open comment period from October to December 25. The Committee would like to know what kind of process was used for this open comment period because one comment does not seem like nearly enough for such an important document. How was this document distributed for public comment?

Second, have students been given the opportunity to comment on the document? To our knowledge, the Graduate Student Association has not received a copy of this document yet. Arguably, students are more affected by UC Police Policy than any other group. Also, the Committee questions the timing of this review. Students are currently busy with the end of the academic year and will soon be leaving campus for the summer. If students are not to be included in the review process, the Committee would like an explanation as to why that is.

Third, the Committee takes issue with the approval process for use of "SRT equipment", which includes kinetic energy weapons/projectiles, and chemical agents. The policy states that this "equipment" will be used at the discretion of the Host Campus Chief. The Committee believes that there should be an appeal to a higher campus level authority outside of the police department before this "equipment" can be used against the student body.

Finally, the UCSB Police collaborates with other groups such as the Santa Barbara County Sheriff's Department, the Goleta Police Department, the California Highway Patrol, and the Santa Barbara Police Department. How does this document work in relation to those groups and the overlapping jurisdictions?

CC: Shasta Delp, Executive Director, Academic Senate

UC SANTA BARBARA
Academic Senate

DATE: June 16, 2026

TO: Rita Raley, Divisional Chair
UC Santa Barbara Academic Senate

FROM: Committee on International Education

RE: Response to the Systemwide Review of Proposed Presidential Policies Applying to University of California Police Department (UCPD)

The Committee on International Education (CIE) has reviewed Proposed Presidential Policy Systemwide Policies Applying to University of California Police Department (UCPD). In the documents, which were noted to be “proposed revisions” in the accompanying letter, the committee found the document to be lacking the clarity that would be needed to communicate with all members of the university community that welcomes students, staff, and faculty from all over the world. CIE noted that part of the accreditation process is to “require campus law enforcement agencies to maintain current, clearly articulated, and regularly reviewed policies.” This 100+ page packet of policies is not organized as such. CIE requests that a main “table of contents” be added to more clearly identify the many sub-sections and policies that are throughout the document. While many of the changes are simple language changes, a document containing many different policies, each with their own generic “table of contents,” does not clearly articulate these policies to the wider community. The length and organization may make it difficult for some international students, who are already adjusting to a different police culture, to fully understand.

The committee understands that these policies have been active for many years. Still, members express concern regarding section, “1320.00 MILITARY EQUIPMENT.” CIE suggests the need for acquisition of military grade equipment be reconsidered. Members view UCSB as a welcoming campus to the international community and the potential display and use of military grade equipment on a college campus does not create an inclusive environment, especially with many community members being countries without a militarized police force.



1156 HIGH STREET
SANTA CRUZ, CALIFORNIA 95064

Office of the Academic Senate
SANTA CRUZ DIVISION
125 CLARK KERR HALL
(831) 459 - 2086

June 26, 2026

AHMET PALAZOGLU
Chair, Academic Council

RE: Proposed Presidential Policy - Systemwide Policies Applying to University of California Police Department (UCPD)

Dear Ahmet,

The Santa Cruz Division of the Academic Senate has completed its review of the proposed Presidential Policy on Systemwide Policies Applying to University of California Police Department (UCPD) with the Committees on Academic Freedom, International Education, and Planning and Budget (CPB) responding.

The Division overall found that this proposal includes many favorable changes that emphasize duties and responsibilities, with a directive to maintain civility as well as enhanced focus on escalation and safeguards against the use of force. That said, our responding committees also raised a number of specific issues and concerns, which we hope can be used to improve the policy.

Non-Native English Speakers, and International Education

With regard to International Education, one main concern expressed was that scholars or students who are non-native English speakers might find themselves in a position where they do not correctly understand police directives, possibly leading to the preventable use of physical force. Proportionality, Escalation, and Conflicting Command. While we appreciated new safeguards, including the duty for another officer to intercede but restrictions on chokeholds, but also question how a subject's "*apparent ability to understand and comply with officer commands*" (1311.3.3.g.) will be evaluated, in context of their ability to clearly understand, in particular in highly stressful and confusing situations?

Proportionality and Escalation

When an officer deploys physical force, a subject's natural and involuntary physiological response is to brace, tense up, or attempt to shield their vital organs from pain. The policy must explicitly state that these defensive pain-responses *shall not be used as an excuse to escalate* or ramp up

force. Officers must actively attempt de-escalation whenever practicable, even after force has initiated.

Contradictory Commands

If multiple officers are shouting different, contradictory orders at a subject simultaneously (e.g., "Show me your hands!" while another shouts "Get on the ground!"), the policy must also make clear that a subject's hesitation cannot be interpreted as non-compliance. The burden is entirely on law enforcement to provide singular, clear, and practicable commands.

Pain Compliance Limits

The phrase "*once the officer has determined compliance has been achieved...*" requires an absolute boundary. **The policy must establish strict time or physical limits on pain compliance techniques to ensure they do not cross into punitive actions**, which would violate Constitutional protections against cruel and unusual punishment.

We understand that many aspects of the use-of-force policy changes appear to be intended to align the policy with current state law. We are concerned, however, that the rewrite reduces previously specific provisions governing firearms, chemical agents, batons, and electronic control devices, including firearms proficiency requirements, to more general language. The systemwide standard can retain both the general principle and the specific protections, and proficiency requirements should extend to tasers and similar devices.

Data Policy Training

We would also like to see training throughout the police department directed specifically toward what available data can be shared with outside agencies. In particular, the case of the automated license plate recognition system at UC Merced provides a cautionary tale. The UC Merced parking office made promises that their data would not be shared with outside agencies; however, they or their vendors did in fact share this information with several federal and out-of-state agencies including Border Patrol, resulting in fear that not only students and staff might be targeted, but also that friends and family members might be endangered by coming to the graduation ceremonies of students with ties to outside countries. We note that without the proper training, the sharing of data might happen without proper consideration, not with malice, but simply without adherence to the laws and policies applicable to the sharing of information.

[*Records show UC Merced police are sharing license plate data with Border Patrol, Merced Sun-Star, 4/23/26.](#)

Background Checks and Standards for Employment

Regarding Section 1306.00, which governs Sworn Personnel Standards for Employment, a critical vulnerability exists within Section 1306.2 regarding the disclosure of candidate background checks and prior conduct history. The policy currently *fails to explicitly mention background checks*, introducing a concerning loophole where officers facing active investigations for excessive force or serious misconduct could potentially evade accountability by separating from their previous employer before the inquiry is finalized. While a thorough background evaluation may be mandated under separate minimum selection standards, the Division recommends that this policy clarifies these requirements, to avoid the nationwide epidemic of "wandering officers". Specifically, the revised text must state that a candidate's professional history must be completely

free of suspicious use-of-force patterns or unresolved misconduct investigations, thereby effectively closing the "lateral transfer loophole" that allows officers to outrun incomplete disciplinary records.

The proposed policies designate the Office of Systemwide Community Safety, a UCOP office, as the body responsible for systemwide coordination, replacing the former rotating Coordinator of Police Services. However, the documents offer no budgetary explanation for this. CPB assumes UCOP funds the office, but if any portion is assessed to the campuses, this would be a new campus expense. We ask that the funding source be confirmed. Additionally, the policies stipulate that there should now be a co-coordinator in the last year of the council of chiefs coordinator's term, to ensure a smooth transition, but the policies do not indicate whether the co-coordinator will automatically transition into the coordinator role in the following year. Moreover, the section on mutual aid uses the term "chair" instead of "coordinator" of the council of chiefs. We recommend consistency in the use of terms, to avoid confusion.

Mutual Aid Policy

The revised mutual aid policy is our principal budgetary concern. Several elements of this policy relate to potentially large budget items, such as overtime at both the host and guest campuses, travel, lodging, and meals. The policy sets no caps on lodging and meal reimbursement and does not clarify whether (or which) existing UCOP travel and reimbursement policies are applicable here. Campuses should conduct a clear cost-benefit analysis before requesting mutual aid, and the local Senate be consulted on this decision.

Finally, the mutual aid policy appears to delete the section governing investigation of citizen complaints involving mutual aid personnel. Together with the lack of clarity over which campus's use-of-force rules apply to a visiting officer, this leaves accountability for a guest officer's conduct unclear.

Modernizing Substance Use Language (Sections 1305.9 & 1305.9.3)

The Senate finds the current framework here to be outdated and flawed in a number of respects. It isolates "Alcohol, Drugs, Narcotics" in headers but pivots almost exclusively to "Alcohol" in the subsections, relying on vague terms like "behavioral modification substance."

- **The Critique:** Alcohol *is* a drug. Furthermore, drugs do not just alter behavior—they drastically impact cognitive processing, motor functions, and physical reflexes, directly compromising an officer's ability to safely perform their duties.
- **Proposed Revision:** The entire section should be streamlined to focus generally on **any substance use that contributes to cognitive or physical impairment**, regardless of classification.
- **Legal Distinctions:** It is necessary to explicitly distinguish between legal and illegal substances. Under California State Law, cannabis is legal, whereas Federal Law classifies it as an illegal controlled substance (with no exception for medical use). Because the use of illegal substances is strictly governed by separate statutory laws, this policy should focus primarily on the operational impairment caused by legally consumed substances (prescription medications, state-legal cannabis, and alcohol). Finally, if this is not already the case, police should also be subject to applicable sanctions under law for the use of

illegal drugs, especially while on duty.

Technical Typos & Cross-References

In addition to main aspects above, we also flag some editorial and cross reference issues within the document:

- **Section 1305.7:** Contains an outdated reference to "section 505." This needs to be explicitly corrected to **1305.5**.
- **Section 1305.9.4:** The exception noted for "prescription drugs" lacks integration; it should explicitly reference **Section 1305.10** for complete policy cohesion.
- **Section 1311.3.3:** The phrasing should be reworded for clarity to read: *"the effects of suspected alcohol or other drug use."*
- **Section 1307.5:** The word "**calendar**" is misspelled with a number "1".
- **Required Items:** The "required items" an officer must equip when in full uniform are not explicitly listed here. For clarity, this section should insert a direct cross-reference to **Section 1309.2.2**, which details standard duty-belt equipment.
- The term "**Latex Gloves**" is misspelled in the text and needs correction.

Finally, while the UCPD's central mission is campus safety, as well as preserving university property and human life, committees also suggested that peace officers' mission specifically with a university context is broader. Specifically, policies proposed make no mention of protecting the fundamental academic missions of the university. This would necessarily involve protecting academic freedom and freedom of expression, as well as student ability to attend their courses as scheduled, and for faculty research activities to proceed unfettered. Following this, it was suggested that the policies of the police force specific to the University of California ought to acknowledge a commitment to safeguarding these core mission aspects.

On behalf of the Santa Cruz Division, I thank you for the opportunity to provide comment on this policy.

Yours Sincerely,



Matthew D. McCarthy, Chair
Academic Senate, Santa Cruz Division

cc: Heather Shearer, Chair, Committee on Academic Freedom
Rebecca Braslau, Chair, Committee on International Education
Raphael Kudela, Chair, Committee on Planning and Budget
Matthew Mednick, Executive Director, Academic Senate



Academic Senate

Office of the President
1111 Franklin Street
Oakland, CA 94607

senate.universityofcalifornia.edu

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UNIVERSITY COMMITTEE ON DIVERSITY, EQUITY, AND INCLUSION
(UCODE)

Kristen Holmquist
klholmquist@berkeley.edu

July 15, 2026

Ahmet Palazoglu
Chair, Academic Council

RE: Systemwide Review of Proposed Presidential Policy - Systemwide
Policies Applying to University of California Police Department (UCPD)

Dear Chair Palazoglu,

UCODE was persuaded by the UC Merced Committee on Equity Diversity
and Inclusion's analysis of the Proposed Presidential Policy – Systemwide
Policies Applying to University of California Police Department (UCPD),
presented below. We adopt it in full:

In reviewing the proposed revisions to the Proposed Presidential Policy
Systemwide Policies Applying to University of California Police Department
(UCPD), EDI noted that in July 2018 Academic Council reviewed and
approved the report of the Systemwide Public Safety Taskforce (a faculty
taskforce assembled under UCFW) that specifically addressed the policies
outlined in the then-current (2010) version of the systemwide policies on
policing as well as draft chapters that appear to have been ultimately
included (at least in part) in this most recent (2025) proposed revision.
While some of the changes recommended by the Senate taskforce were
implemented in the proposed revisions currently under review, many
others remain unaddressed. Thus in the course of this review, EDI will
reference both the current proposed policies as well as the report of the
Systemwide Public Safety Taskforce (also attached) where it remains
relevant (as it does in the many cases). Note that as the numbering and
ordering of chapters has changed between the 2010 and 2025 versions of
the policies under review, any references to the 2018 Senate taskforce
report are updated to include reference to the appropriate sections in the
most recent draft chapters under review as well as the original section
numbering.

Overview

Upon reviewing the entirety of the new Proposed Presidential Policy Systemwide Policies Applying to University of California Police Department, EDI finds itself in agreement with the conclusions of the original Senate taskforce report from 2018 which suggested an urgent need to “better tailor police operations to the unique needs of a university environment,” including “a focus on the sanctity of human life, procedural justice, and more democratic and transparent approaches to policing.” While the newly proposed revisions address some of the specific concerns raised by the 2018 Senate taskforce, many others remain unaddressed and some of the changes from the 2010 UCPD policies actually appear to represent a step backwards. Below we offer some specific commentary and suggestions drawn from both our reading of the proposed policies currently under review and the 2018 Senate taskforce report.

Before addressing specific commentary, EDI notes that there is still an urgent need to holistically review policing within a university environment and the ways that it might be supplemented and eventually replaced with a more community-centered model of safety that does not rely on armed, sworn officers. While there was much discussion of these issues both nationally and at the UC in the wake of the 2020 police murder of George Floyd (as well in the previous Senate and administrative task forces on this subject), momentum has stalled in the intervening years and the proposed revisions to UCPD policies still maintain a very traditional approach to policing that does not adequately reflect either the unique university environment or the underlying structural issues around race, class, and policing that were all-too-briefly surfaced during the national reckoning around this subject in the summer of 2020. UC is home to many qualified and talented scholars from a variety of fields who would be well-placed to help reimagine policing and public safety in the context of a public university and we urge that in addition to the technical changes outlined below, that UC leaders strongly consider convening a larger body to undertake this task.

1301.00 GOVERNANCE & APPLICABILITY OF SYSTEMWIDE POLICING POLICIES

EDI notes that the following comments from the 2018 Senate report remains applicable:

Section 101.2 [now 1301.1.2] (Departmental Policies and Procedures) allows for local UCPD departments to formulate their own local policies

and procedures. As written, it states that these local policies “may be written more restrictively than [the Gold Book]. . . however they may not be written to supplant or diminish the Policies and Procedures contained within the Universitywide document.” While the intent here appears clear, the language used (“diminish,” “more restrictively”) is somewhat loose and in the experience of some task force members there has not always been clarity on this issue at the local level. In the interest of consistency, we urge that a formal mechanism for reviewing campus regulations and procedures at the systemwide level to ensure their compliance with the Gold Book be written into this section of the document.

1302.00 STATUTORY AUTHORITY

EDI further notes that this recommendation from the 2018 Senate report remains applicable:

Section 202 [now 1302.2] (Concurrent Jurisdiction) outlines the shared responsibilities of UCPD with local law enforcement agencies. Given the realities of concurrent jurisdiction and the fact that UCPD policies and procedures may differ from those employed by local agencies, the task force suggests that there be some discussion of the way in which differences or conflicting policies are handled in such situations. This is particularly important with respect to the sensitive issues of campus protests and immigration enforcement. UCPD obviously cannot dictate the procedures followed by local agencies, but some discussion about the ways in which such differences are resolved on issues that are sensitive to the campus population seems important. This issue is particularly urgent in the area of immigration law enforcement, where campus policies may differ substantially from that of local agencies. We also suggest that the Gold Book be amended to contain language suggested by the Robinson/Edley report to the effect that “In most situations, our Police Chiefs should seek assistance

1303.00 POLICE DEPARTMENT, ORGANIZATION

EDI notes that the following two recommendations from the 2018 Senate report remain relevant and unaddressed by the current changes:

Section 301.4 (a)-(e) [now 1301.1.4 (a)-(e)] which outlines the operations of the Chief’s Council does not include anything about the publication of minutes and agendas. The task force urges that in the interest of transparency that such material be published on a regular basis and that this requirement be written into the Gold Book. We recognize that some issues that come before the Chief’s Council may require the discussion of confidential materials. We routinely handle such matters in the Academic

Senate through the use of executive sessions and this should not prevent the timely publication of agendas and minutes on non-confidential matters.

Section 303.4 [now 1303.3.4] (Individual Responsibilities of Officers) lists “The suppression of crime” as a key goal in subsection (c). While this is undoubtedly standard language and may imply non-controversial actions such as securing unlocked doors, it also has associations with more controversial policies such as “broken windows policing” and “stop and frisk.” Similarly, there was concern with subsection (m) which lists “Promoting University Police morale” as a key responsibility of officers. The task force suggests that that subsection be rewritten to include a statement about the needs and morale of the university community as a whole.

1304.00 ADMINISTRATIVE COMMUNICATIONS

EDI calls attention to the following 2018 Senate recommendation which remains unaddressed:

The task force expressed some concern with sections 401.1 (a) [1304.1.1 (a)] and 404 [1304.4] with respect to lawful orders and conflicting orders. We recognize that the daily function of police departments depends on subordinates following the orders of their superiors, but are not convinced that the procedures outlined in these sections are sufficient to deal with cases of potentially unlawful orders. While not sufficiently versed in the legal nuances of this question to offer practical advice, in order to protect both the community and individual officers who receive potentially unlawful orders we suggest that OGC review this question in some depth with an eye toward how such issues are handled as part of the Uniform Code of Military Justice (UCMJ) articles 90 and 92.

1305.00 PERSONNEL, DUTIES AND RESPONSIBILITIES

EDI notes that all of the recommendations below from the 2018 Senate report remain unaddressed:

Section 501 [now 1305.1] (Inappropriate Conduct) declares that “any conduct which interferes with police operations may result in corrective action or dismissal.” The task force suggests this be revised to include language to the effect that inappropriate conduct towards the community served by the police may also be grounds for corrective action or dismissal.

Section 501.1 (d) [now 1305.1.1 (d)] stipulates that officers “shall not

speak disparagingly of any person or group on the basis of race, color, national origin, religion, sex, gender identity, pregnancy (pregnancy includes pregnancy, childbirth and medical conditions related to pregnancy and childbirth), physical or mental disability, medical condition (cancer-related or genetic characteristics), genetic information (including family medical history), ancestry, marital status, age, sexual orientation, citizenship or service in the uniformed services “race, color, national origin. . . .” The task force urges that this section should [be] extended beyond speech acts to extend to other forms of expression that can be disparaging to the named groups, including posting on social media, colloquial gestures, and coded forms of discriminatory or derogatory expression. It should also be made clear that such employees can be subject to whistleblower complaints when their behavior is seen to abrogate these ethical responsibilities. Additionally, a clear set of consequences should be developed to address those officers who are seen to violate this ethical responsibility, and the enforcement of those consequences should be immediate (including when accusations or whistleblower cases are under investigation).

With respect to Section 503 [now 1305.3] (False Reports), the task force suggests that that language be added that obligates officers to correct or otherwise revise their reports whenever information is brought to their attention that contradicts the contents of their original report.

Section 505 [now 1305.5] enjoins the police to use “care to ensure that any release of information is not detrimental to the conduct of police operations.” The task force suggests that this be expanded to include consideration of the detrimental impact of releasing information on the subjects of a police encounter. As noted in the Final Report of the President’s Task Force on 21st Century Policing, “One way to promote neutrality is to ensure that agencies and their members do not release background information on involved parties. While a great deal of information is often publicly available, this information should not be proactively distributed by law enforcement.”

Section 512.2 [now 1305.12.2 (a)] (Police Identification) specifies that “Officers in uniform shall identify themselves by displaying their badge and nametag at all times unless authorized to remove the badge by a ranking officer” (emphasis added). The task force saw no reason why an officer in uniform should be able to remove their badge or nametag under any circumstances. We strongly urge that the “ranking officer” exemption be removed from this section and if any exemption is allowed that the circumstances under which it is allowed. . . be much more carefully delineated.

The task force urges that Section 512.2 [now 1305.12.12] (Impaired Physical Condition) be expanded or that a section be added regarding mental and emotional health of officers. It is by now well known that police officers have some of the highest rates of domestic violence, depression, and suicide of any profession. There should be a clear policy that obligates officers to be transparent about their mental and emotional wellness and to make reports when they believe a colleague may be having issues with their mental/emotional health. To continue to limit this policy to “impaired physical condition” and a limited definition of “psychological condition” that does not cover the full range of mental and emotional wellness is outdated and irresponsible.

1306.00 SWORN PERSONNEL STANDARDS FOR EMPLOYMENT

The 2018 Senate report contained the following recommendation:

First, a diversity statement should be added to the hiring requirements for UC police officers. Contributions to diversity are now included in all faculty personnel cases and are being considered for staff positions at some campuses at well. Given the diversity of the campus population that they will be serving, we suggest that some formal recognition of this be included in the police personnel process in the form of a mandatory diversity statement as part of the requirements for hiring or transfer.

UC police officers are represented by The Federated University Police Officers Association (FUPOA) under the July 1, 2022 – June 30, 2026 Memorandum of Understanding negotiated pursuant to the Higher Education Employer-Employee Relations Act (HEERA) and the Regents of the University of California. Under Article 5, "Management Rights" the university retains the right “To establish the size, composition and qualification of the work force; to determine the nature of positions and whether or not to fill those positions; and to use tests, interviews and other selection techniques to hire, promote, and transfer and otherwise evaluate employees (Article 5.A.11) and To recruit, hire, train, evaluate, promote, transfer, reclassify, demote or layoff employees (Article 5.A.12),” M This means the university has a clear contractual authority to incorporate criteria in a hiring and promotion process reflecting a commitment to diversity for sworn officers, without requiring a bargaining session, provided that such criteria are applied consistently and in good faith.

We strongly urge the university to exercise this management right by incorporating meaningful evaluation of officers’ commitment to diversity—as articulated in Regents Policy 4400—into its standards for hiring, and at a minimum, into the criteria used for promotion and

transfer.

Concretely, evaluating an officer's commitment to diversity might mean asking a candidate to describe their experience working with diverse communities, or assessing whether an officer seeking promotion has completed training on implicit bias or cultural responsiveness in policing. It might also mean evaluating whether an officer has a documented record of community engagement with multiple community groups, and how they worked with those communities to ensure safety and protection. These suggestions do not select for or against any protected class in a police officer, rather they select for professional skill demonstration and orientation to working with a diverse campus community with varied social and cultural experiences. The university's interest is in how a police officer performs their job duties, not in who they are as a protected class.

EDI also endorses the following more general sentiments on training and the need to go above-and-beyond the minimum requirements of POST from the 2018 Senate report:

More broadly, the Final Report of the President's Task Force on 21st Century Policing recommends that officer training should "include mandatory Crisis Intervention Training (CIT) which equips officers to deal with individuals in crisis or living with mental disabilities, as part of both basic recruit and in-service officer training" as well as "instruction in disease of addiction, implicit bias and cultural responsiveness, policing in a democratic society, procedural justice, and effective social interaction and tactical skills." The report also recommended specific training that "covers policies for interactions with the LGBTQ population, including issues such as determining gender identity for arrest placement, the Muslim, Arab, and South Asian communities, and immigrants or non-English speaking groups, as well as reinforcing policies for the prevention of sexual misconduct and harassment." The task force recognizes that minimum training standards are defined by the California Peace Officer and Standards Training (POST) board; UCPD, however, should seek to do more than the minimum and should make every effort to ensure that its officers receive this sort of training and re-training on a regular basis and provide supplementary training for areas above not covered adequately by POST. As the Robinson/Edley report concluded, "Our police departments currently adhere to minimum POST standards on training, and they should continue to do so. But we believe that that alone is insufficient."

1311.00 USE OF FORCE

The section was extensively re-written from the 2010 version but while

some of the concerns raised in earlier review were addressed, many of the comments from the 2018 Senate task force remain relevant to these proposed revision to the use of force section as noted below:

This task force also affirmed that the use of force policy should make it explicit that officers should not use their authority to instigate actions on the part of civilians, or exacerbate tensions between officers and civilians, as a means for constructing a basis for the justification of the use of force (i.e. “set the hook”). As per Robinson/Edley, “certain police tactics are likely to increase tensions with demonstrators. Recognizing the likely impact of these tactics and considering the alternatives, where possible, can mitigate this risk. For example, the manner in which officers are outfitted, the types of weapons they carry, and how any weapons are displayed can escalate or de-escalate a situation.”

Section 802 [now 1311.1.1] (Definitions) contain several instances of troubling ambiguity. “Active Resistance” is defined to include “bracing” and “tensed muscles.” [rewritten simply as “tensing” in the new version] While we understand that this definition is likely drawn from Police Officer Standards and Training (POST) materials, more clarity is needed, particularly in a university environment as once a subject is defined in active resistance, it opens up a wider range of possible actions that the police may legally undertake.

In addition, EDI notes with concern that all policies dealing with firearm safety, inappropriate use of firearms, chemical agents, and less-lethal devices have been removed from this section. While some of these sections are addressed at least in part in other chapters (e.g. the section on “Use of Chemical Agents” in 1316.20), not all of the removed material appears to have been preserved in other locations. Given the importance of these subjects for public safety, it is important to understand why these sections have been removed at the very least.

EDI also suggests stronger language in sections 1311.3.1 (ALTERNATIVE TACTICS - DE-ESCALATION) and 1311.3.4 (PAIN COMPLIANCE TECHNIQUES):

As time and circumstances reasonably permit, and when community and officer safety would not be compromised, officers should consider actions that may increase officer safety and may decrease the need for using force [1311.3.1]

Officers should apply those pain compliance techniques for which they have successfully completed Department-approved training. Officers utilizing any pain compliance technique should consider [1311.3.4]

In both cases, we strongly suggest that the term “should” in the statement above be changed to “shall,” which in legal parlance means “considered to mean mandatory” rather than “considered to be advisory.”

1312.00 ARRESTS

EDI is concerned that the following sentence has been struck from 1312.2.3: “No officer shall strike an arrestee or suspect except in self-defense, to prevent an escape, or to prevent injury to another person” and urges in the strongest possible terms that it be restored to the final draft.

In addition, EDI reiterates the following concerns raised by the 2018 Senate task that remain unaddressed in this iteration of the document:

The task force noted that in general this chapter was very underdeveloped and failed to include basic procedures such as the need to inform those being arrested of their Miranda rights. Presumably these procedures are outlined in more detail in the policies of local campus PDs. In the interests of uniformity, however, the task force strongly recommends that this chapter be revised and expanded so as to serve as the default set of procedures for arrests systemwide. We see no reason why there should be any notable variation in such procedures across campuses and yet in the absence of a more detailed set of policies in the Gold Book such tasks must by default fall to the campus PDs. Further, there is a need to state clearly that officers should rely on alternatives to arrest (e.g., issuing a summons or citation).

Section 902.1 [now 1312.2.1] (Precautions) should be amended to suggest that officers also need to take into account the safety of bystanders when making an arrest.

1313.00 BIAS-BASED POLICING

EDI notes inconsistent use of “should” and “shall” in 1313.5 (Supervisor Responsibilities). We strongly recommend that in (a), (b), and (d), the language should be changed to “shall” (which is already the case with item c) as these items should be required and not advisory. We similarly recommended the use of “shall” in section 1313.7 (Administration). These concerns also apply in 1313.4 and 1313.5 (b) where EDI also recommends the use of “shall.”

1316.00 CROWD & DEMONSTRATION MANAGEMENT

Section 1316.19 (USE OF FORCE OPTIONS) contains several definitions which were deemed troubling by the 2018 Senate task force:

“Active Resistance” is defined to include “bracing” and “tensed muscles.” While we understand that this definition is likely drawn from Police Officer Standards and Training (POST) materials, more clarity is needed, particularly in a university environment as once a subject is defined in active resistance, it opens up a wider range of possible actions that the police may legally undertake. Similar ambiguity is found in the definition of “Assaultive Resistance.” It is not clear if this definition includes only physical actions taken against an officer or if it also applies to verbal statements made by the subject of the encounter. Would a statement such as “I will kick your ass if you try to arrest me!” count as “Assaultive Resistance?” This is a crucial question as it helps to determine the type of force that may be legally employed in response by the officer.

In Section 1316.20, “Only properly trained personnel should be authorized to deploy nonlethal chemical agents. Nonlethal chemical agents, protective masks, maintenance, storage, and security must be addressed by UCPD,” the phrase “shall” should be used instead of “should.”

Section 1316.23 (Terms and Definitions: Appendix A) contains the following definition: “Anarchist: A person who uses unlawful, violent means to cause disorder or upheaval.” This is a highly charged and inaccurate definition of anarchism. The term conflates a political philosophy with criminal behavior, and a police officer has no way of distinguishing between a peaceful self-identified anarchist from someone engaged in actual violence or purposeful disorder (would all individuals who use unlawful means be anarchists under this definition?) . The conflation could increase risk management and legal exposure for the university if a police officer applied this definition to an individual’s political identity rather than conduct that presents immediate harm to the self or others in a policing situation.

1317.00 SYSTEMWIDE RESPONSE TEAM

The chapter dealing with the Systemwide Response Team (SRT) was only available in draft form during the review of the 2018 Senate taskforce as it was not yet integrated into the larger policy document. The current (2025) draft differs in some ways from the draft reviewed by the Senate in some ways, but the following comment raised by the task force remains a matter of great concern to EDI:

The task force was greatly concerned that sections 1601 (Purpose) and 1603.1 (Request for SRT Deployment) make no mention of the Chancellor or their designee, leaving the dispatch and control of the SRT entirely to UC police chiefs. The Introduction to the current published version of the Gold Book makes it clear that “Responsibility for security and law enforcement at each campus is assigned to the Chancellors. . . .” As written, however, this draft chapter has no place in the SRT chain of command for the Chancellor of the campus in question or UCOP. Nor is it even stated that a Chancellor/UCOP must be notified when the SRT is requested. The dispatch of the SRT represents a major escalation that can have a profound impact on the campus community. While there may be cases where a rapidly escalating situation might require a campus chief to request the SRT before they can make contact with the Chancellor or their designee, the Chancellor must have a role in the chain of command and should be contacted and asked for approval whenever practicable. Given that the SRT is a systemwide body, the President or their designee should also be formally included in the chain of command. Finally, it must be made clear what happens if there is disagreement between the local chief and the Chancellor or UCOP over whether or not the SRT should be called upon in a particular situation. The Robinson/Edley report expressed great concern that on the campus level, “there is currently no formal link between the Incident Command System and the campus administration” and raised similar issues about the possibility of clashing UCPD and administrative decision making at the local level.²⁰ While good progress has been made on the various campuses to remedy this issue, this draft chapter on the SRT essentially replicates the same problem at the systemwide level. Given the high stakes associated with the dispatch of the SRT, this is an issue that must be urgently resolved.

Section 1606.3 [now 1317.6.3] (Discretion of Host Campus Chief) declares that “SRT personnel will not be prevented from carrying and/or using non-SRT weapons that have been issued or approved by their home campus.” As per our comment on 822.3 (Firearms, Inter-campus Use), the task force strongly urges that policies on firearms should be consistent across campuses.

1318.00 SYSTEMWIDE UCPD MUTUAL AID

In section 1318.02 (Requesting Mutual Aid), EDI notes that, as with the SRT, it should be mandatory that the Chancellor or their designee be notified as part of the mutual aid process.

EDI also questions why the following sentence was removed from section

1311: “Investigation of a citizen's complaint, involving mutual aid personnel, is the responsibility of the guest campus in conjunction with the host campus. The guest campus of the involved officer will be notified of the complaint in a timely fashion and invited to participate in the investigation.”

1319.00 BODY-WORN CAMERAS

The 2018 Senate task force commented extensively on what was then a draft chapter regarding body-worn cameras. Much of that commentary remains relevant to the current draft, as indicated below:

The task force identified a key concern that cannot be easily remedied: the adoption of body cameras without any public discussion with faculty, staff or students. The task force sees this as a departure from the forms of “democratic policing” that should be embraced at a world-class public university. Democratic policing relies on civic engagement, transparency, and accountability both before and after the adoption of a new policing policy, especially one that is likely to have a significant impact on students at the university who travel across private, public, and semi-private spaces with regularity. Such a forum also would have allowed for a discussion about the rationale for adopting body cameras, community access to footage, storage issues, etc. These conversations are especially important given two recent studies, including a seven-month randomized controlled experiment, in which approximately 1000 Washington, D.C. officers were outfitted with body cameras and another 1000 went camera-less, researchers found no differences in officer use of force or civilian complaints among officers in the study. If cameras have little impact on officer behavior or civilian complaints, as the small body of existing research suggests, then what and who are the cameras for? As is, the policy reads as if the cameras are for officers only, yet the answer to this question should have evolved from a public discussion that involved various members of the campus community.

The adoption of a body camera policy must take into account the importance of accountability (which was also emphasized in a report from President Obama’s Task Force on 21st Century policing). Body cameras should not be used solely as a tool for law enforcement, as is currently reflected in the draft policy. This is especially true in the guidelines regarding officer access to video recordings during the report-writing process. There should be a very bright line between the construction of an officer's initial report and the completion of a subsequent video-assisted report. The Task Force is strongly opposed to allowing officers to review footage prior to writing an initial report. The construction of an initial report is already a degree removed from the

incident in the field. A video recording is a distinct type of evidence that is also a degree removed from the actual encounter. The difference between the two is made invisible to the public when the two sources of information – officer recollection and video evidence – are used to construct an initial report. When used in this way, the balance of the benefit of body worn camera is tilted entirely in an officer’s direction and away from the community. A model for this type of division is the Body Worn-Camera Program Amendment Act of 2015 (Washington, DC), which states that in cases of use of force members involved in a police shooting shall not review their BWC recordings, or other members’ recordings, related to the case. This policy emerged from a democratic process, in contrast to the top-down approach evidence in the current policy. The Task Force recommends at a minimum that such a policy be adopted at a minimum for all instances involving the use of force.

The prioritization of officers’ concerns is also reflected in the prioritization of officer safety. The task force recommends that the language of the policy reflect a concern for all involved in an encounter. This approach to the use of force has been embraced by a number of major police departments across the country (referred to as “sanctity of life”). The document should also use language that reflects the varied citizenship statuses of our students (for example, using “civilians” or “persons” instead of “citizens”). Officers should also be required to distribute contact cards that provide the public with relevant officer information (Name, Badge #, Supervisor, etc.), as well as information on how the recordings are used, where they will be housed, and how to access recordings of their Interaction.

In addition to these suggestions, the task force also has some suggestions for specific language to be inserted or modified within the existing draft. Section XX02 (Required Users) [now 1319.4 (a) BWC USE] gives the examples of “gang task force” and “violent crime task force.” The Senate task force assumed that this was language drawn from a municipal police manual and should be removed as UC as no need for such bodies

1320.00 MILITARY EQUIPMENT

EDI strongly believes that the default position of UCPD should be that it will not procure, train with, or employ military equipment. However, we understand that AB-481 “Law enforcement and state agencies: military equipment: funding, acquisition, and use” makes the following provision:

This bill would require a law enforcement agency, defined to include specified entities, to obtain approval of the applicable governing body, by

adoption of a military equipment use policy, as specified, by ordinance at a regular meeting held pursuant to specified open meeting laws, prior to taking certain actions relating to the funding, acquisition, or use of military equipment, as defined. (para. 2)

EDI further recommends that the university strengthen its implementation of AB 481's public notice requirements to provide meaningful campus and public consultation. The current workflow creates a sequencing problem for meaningful input. The approval of military equipment funding, acquisition, and use happens at the Board of Regents level where the members of the Compliance and Audit Committee provide a public meeting notice in September Board of Regents meeting for "Consent Item: University of California Compliance with State Assembly Bill 481 (cf.

<https://regents.universityofcalifornia.edu/regmeet/sept25/audit.pdf>) for the review of inventory across the ten UC campuses alongside requests for new equipment. Afterward, each campus is to "... within 30 days of the submission of an annual report to the Regents, each UC Campus Police Department must hold 'at least one well-publicized and conveniently located community engagement meeting, at which the general public may discuss and ask questions regarding the annual military equipment report and the law enforcement agency's funding, acquisition, or use of military equipment'" (Compliance and Audit Committee, 2025, p.4)

In 2025, the following campus-level community engagements occurred: :

1. UCLA: The annual military equipment report was publicly released on UCLA's police webpage on August 11, 2025 with the "community engagement meeting ... held via Zoom ... on Friday, August 29, 2025" (cf. <https://police.ucla.edu/about-ucla-pd/departement-information/data-transparency/ab481>)
2. UC Irvine: Elizabeth Griffin with the UC Irvine Police Department emailed all UCI Employees (Campus, UCI Health, and College of Health Sciences, and all UC Students of the Assembly Bill 481 Annual Community Meeting on August 21, 2025 with the annual community meeting being held on September 4, 2025 in the EHS Building - Bernardion Ramazzini Room. (cf. https://police.uci.edu/about-us/communications-archive/2025_AB481.pdf)
3. UC Davis: The UC Davis Accountability Board held a special session on Wednesday, September 10, 2025 (cf. <https://police.ucdavis.edu/professional-standards/policies/ab481>)
4. UC Berkeley: States it does possess or use equipment "...procured by the United States Department of Defense through the Law

EnforcementSupport Program) and its “forum” was held on October 15, 2025 at 10am with no location provided publically (cf.

<https://ucpd.berkeley.edu/ab-481-law-enforcement-state-agencies-military-equipment>)

5. UC San Diego: Held a presentation for students and staff on October 16, 2025 (cf. https://ucsdguardian.org/2025/10/20/uc-regents-approve-ucsd-police-military-equipment-purchase/_)

6. UC Santa Barbara: Held an “open house” on November 6, 2025 for “a discussion about AB 481 equipment” (cf. <https://news.ucsb.edu/inside-ucsb/community-and-engagement/join-ucpd-open-house-nov-6>)

7. UC Santa Cruz: Held an annual meeting about AB 481 on October 21, 2025 via Zoom (cf. <https://police.ucsc.edu/how-to-make-a-report/military-equipment-use-policy/>)

The following three campuses have outdated information regarding AB 481 with no information about annual reporting activity for 2025:

1. UC Riverside: A webpage regarding AB 481 exists and has outdated information from 2023 (cf. <https://police.ucr.edu/assembly-bill-ab481>)

2. UC Merced: A webpage regarding AB 481 exists and has outdated information from 2022 (cf. <https://police.ucmerced.edu/ab-481>)

3. UC San Francisco: A webpage regarding AB 481 exists and has outdated information from 2022. (cf. <https://police.ucsf.edu/california-assembly-bill-481-ab-481>)

At stake in the workflow and public reporting are three distinct transparent actions that could have significant improvement to provide increased trust in policing operations across all 10 campuses.

1. AB 481 requires the following:

i. “In seeking the approval of the governing body pursuant to subdivision (a), a law enforcement agency shall submit a proposed military equipment use policy to the governing body and make those documents available on the law enforcement agency’s internet website at least 30 days prior to any public hearing concerning the military equipment at issue.”

a. Currently, there is no publicly available information posted by the governing body (the Board of Regents) of the due date for each campus’s proposed military equipment use policy; therefore, the public is unable to determine if and how the university is compliant with AB 481.

a. The EDI committee recommends that the Board of Regents Compliance and Audit Committee posts the due date for each campus’s proposed military equipment use policy annually in its September agendas for accountability to the public.

2. For multiple UC campuses, the requests before the Board of Regents Compliance and Audit Committee occurred before the 30-day

public hearings.

a. The EDI committee recommends that each campus commits to providing public information about current inventory and requests for military equipment 30-days before the proposed military equipment policy is submitted to the Compliance and Audit Committee as a consent item.

3. California law creates two separate public notices for UC's military equipment decision, and both contain critical gaps the university needs to amend for public trust and safety.

a. First, the UC is subject to the Bagley-Keen Open Meeting Act, and as such, the only notice required is a posting on the internet at least 10 days in advance and provided to anyone who requests it in writing.

b. Second, AB 481 requires each police department to hold one "well-publicized and conveniently located" community engagement meeting within 30 days of submitting its annual report to the Regents.

c. AB 481 does not define "well-publicized and conveniently located" which means each campus police department is left with their own interpretation of what that definition means, instead of one system-wide policy and definition.

d. As the record for 2025 shows, UCLA held a Zoom meeting before the Regents vote; UC Irvine sent an email to its campus community before the Regents vote; UC Davis held its meeting through the Police Accountability Board before the Regents vote; UC Berkeley announced a meeting after the Regents vote on the police department website; UC San Diego announced a meeting after the Regents vote on its police department website, and the student newspaper explicitly noted it "was not publicized elsewhere"; UC Santa Barbara discussed AB 481 after the Regents vote during an "open house."

e. Further, for 2025 at least three campuses had zero public meetings or outreach to the public for AB 481 reporting.

f. Under the University of California [campus] Police Department document submitted to the the Compliance and Audit Committee for the September 17, 2025 meeting, the following provision is included:

i. 1.8 Community Engagement: Within 30 days of submitting and publicly releasing the annual report, the Department shall hold at least one well-publicized and conveniently located community engagement meeting, at which the general public may discuss and ask questions regarding the annual military equipment report and the law enforcement agency's funding, acquisition, or use of military equipment (Government Code § 7072(b)).

g. It appears for 2025, only 3 of 10 UC campuses complied with Government Code § 7072(b).

4. The EDI committee recommends the following given the uneven practices among each campus:

a. Define the notice period in policy: "Well-publicized" shall mean, at a

minimum, direct email notification to all campus individuals; notice in the student (if available) and city newspaper(s)--not solely on the police department website. Notice shall be provided at least 21 days before the community engagement meeting.

b. Pre-Regents Meeting: Each campus community engagement meeting shall be held no later than 30 days before the Regents consent vote.

i. This resequencing is the single most important change as it places community input in a process where meaningful engagement can influence the outcome of what is then reported to the Compliance and Audit committee.

c. Mandatory Record of Community Input: A written summary of questions, concerns, and comments raised at each campus community engagement meeting shall be compiled by the campus and transmitted to the University of California Police Department for its annual report to the Regents no less than 10 days before the Regents vote, so that community input becomes part of the formal record considered by the Compliance and Audit committee.

d. Minimum Engagement Standard: A community engagement meeting attended by zero members of the public should raise significant red flags to each campus police department, and should, as a result of zero attendance trigger a mandatory review of the notice procedures used, rather than it being reported to the Regents as evidence of community satisfaction.

e. Regents-level Notice: When the Compliance and Audit committee's agenda includes an AB 481 military equipment item, the Office of the President shall notify each affected campus Chancellor's office, Academic Senate, Staff Assembly, and student government association directly, and no less than 30-days before the Regents meeting.

While the EDI committee recommends that military style equipment should be entirely prohibited in all 10 campuses, if there is a lack of support for that position, then it strongly recommends that the defined problems (numbers 1 through 3) and solutions (numeral 4) be taken up as a matter of public accountability and integrity.

1321.00 UNMANNED AIRCRAFT SYSTEMS (DRONES)

As with military equipment, EDI sees no reason why a campus policy department should require the use of unmanned aerial surveillance drones. If UCPD strongly believes that such systems are necessary, they should follow the procedure recommended above for "white listing" individual systems while maintaining a general prohibition on their procurement and use.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kristen Holmquist'. The signature is written in a cursive style with a long horizontal stroke extending to the right.

Kristen Holmquist
Chair

cc: UCODE



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UNIVERSITY COMMITTEE ON FACULTY WELFARE
KAREN BALES, CHAIR

July 13, 2026

AHMET PALAZOGLU
CHAIR, ACADEMIC COUNCIL

RE: “Gold Book” Revisions

Dear Chair Palazoglu,

The University Committee on Faculty Welfare (UCFW) reviewed the proposed revisions to the Systemwide Policies Applying to the UC Police Department (UCPD), also known as the “Gold Book.”

UCFW members reviewed individual policy sections and discussed the revisions at UCFW’s May and June 2026 meetings. Detailed section-by-section comments submitted by committee members are attached for consideration. UCFW also offers the summary below.

The committee appreciates the effort to update these policies to reflect changes in law, professional standards, and campus safety practices. Overall, UCFW supports the goal of maintaining clear, current, and comprehensive systemwide policing policies. Members also identified several areas where additional clarification, transparency, and community engagement would strengthen the policies.

First, UCFW encourages stronger recognition throughout the policies of the University’s commitments to academic freedom, freedom of expression, and shared governance. The committee suggests explicitly referencing these principles in the policy to reinforce the University’s educational mission and the unique context in which campus policing occurs.

UCFW also questions whether a single systemwide framework is equally appropriate for all UC environments, noting that there are important differences between medical centers and residential campus settings. The committee encourages consideration of whether some policies should be tailored to those distinct operational contexts.

UCFW supports measures that enhance public transparency and accountability of local UCPD policies and procedures, regular review of systemwide policies with opportunities for input, and periodic public

reporting about implementation and compliance. UCFW also emphasizes the importance of clear reporting, review, and oversight processes, especially in areas involving use-of-force incidents and other matters of public concern. UCFW also encourages consideration of independent review or oversight mechanisms for use-of-force incidents to promote transparency and public confidence.

While UCFW recognizes the need for policies that address emergency situations, the committee notes that the operational environments of academic campuses and major public-facing medical centers often differ in important respects. Accordingly, UCFW encourages greater emphasis throughout the Gold Book on de-escalation, conflict resolution, and community-oriented policing as the primary framework for campus safety.

UCFW members questioned whether certain provisions on military-style equipment and crowd-control resources are appropriately tailored to the circumstances typically encountered on UC campuses. We encourage additional justification and transparency regarding their use.

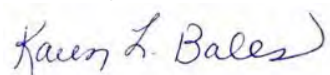
UCFW identified several areas where the policy would benefit from clearer or more specific language. These include the relationship between systemwide and local policies, jurisdictional issues when UCPD activities intersect with external law enforcement agencies, standards governing off-duty conduct and reporting requirements, and the location and applicability of related policies referenced throughout the document. UCFW also identified opportunities to improve consistency across sections, eliminate redundancies, and address technical inconsistencies.

UCFW also raised questions regarding employee rights, privacy, wellness, and due process protections. We recommend clarifying that implementation of provisions concerning employee conduct, medical and psychological conditions, outside employment, and reporting obligations should remain consistent with applicable privacy protections, disability accommodation requirements, collective bargaining agreements, and other UC policies.

Finally, UCFW is concerned that the timing of this review occurs during the summer months when students and other campus stakeholders have limited opportunity to provide meaningful feedback. The committee encourages consideration of additional outreach efforts to ensure that all UC communities have an opportunity to participate in the review process.

Thank you for the opportunity to comment on these proposed revisions.

Sincerely,

A handwritten signature in blue ink that reads "Karen L. Bales". The signature is fluid and cursive, with a large initial 'K' and a stylized 'B'.

Karen Bales, UCFW Chair

Cc: UCFW Members
Senate Executive Director Lin

Proposed Revisions to Systemwide UCPD Personnel, Duties and Responsibilities Policy

I would like to recommend the following changes:

1. Section 1305.1.1(a) – Conduct Bringing Discredit Upon the University

Current Language:

"Employees shall conduct their private and professional lives in such a manner as to avoid bringing discredit upon the University or the department."

Proposed Addition:

"Nothing in this provision shall be interpreted to restrict rights protected by law or University policy, including protected speech, academic freedom, lawful political activity, whistleblower activity, or participation in collective bargaining activities."

2. Section 1305.1.1(b) – Off-Duty Conduct

Current Language:

"Employees acting in a law enforcement capacity, whether on or off duty, shall conduct themselves in a professional manner..."

Proposed Addition:

"Disciplinary action based on off-duty conduct should be limited to circumstances where there is a demonstrable nexus to job performance, public safety responsibilities, or violation of law or University policy."

3. Section 1305.10 and Section 1305.12.12 – Medical and Psychological Conditions

Current Language:

Requires employees to report medications affecting behavior and physical or psychological conditions impairing job performance.

Proposed Revision:

"Implementation of these provisions shall be consistent with applicable disability accommodation requirements, medical privacy protections, and state and federal law. Employees shall not be required to disclose specific medical diagnoses except as required by law."

4. Section 1305.12.13 – Law Enforcement Contact

Current Language:

Requires reporting of law-enforcement contacts.

Proposed Revision:

Clarify that reporting obligations apply when the employee is the subject of a criminal investigation, detention, arrest, restraining order, or other matter reasonably related to fitness for duty.

5. Section 1305.12.7 – Personal Address and Telephone Information

Proposed Addition:

"Personal contact information collected pursuant to this section shall be maintained as confidential personnel information and accessed only for legitimate operational purposes."

6. Section 1305.12.9 – Outside Employment

Current Language:

Requires prior approval for outside employment.

Proposed Addition:

"Approval shall not be unreasonably withheld and shall be based on objective considerations including conflicts of interest, interference with official duties, or legal restrictions."

7. Section 1305.7 – Speaking Engagements

Current Language:

Requires approval before speaking publicly as an official representative of the department.

Proposed Addition:

"Nothing in this section shall be interpreted to restrict employees from speaking in their personal capacity on matters of public concern, consistent with applicable law and University policy."

8. Section 1305.1 – Inappropriate Conduct

Current Language:

"Any conduct which interferes with police operations, even though it is not specifically addressed in this manual, may result in corrective action or dismissal."

Proposed Revision:

"Any conduct that materially interferes with police operations may result in corrective action consistent with applicable law, collective bargaining agreements, and due-process protections."

9. New Section – Non-Retaliation

Proposed Addition:

"Employees shall not be subject to retaliation for reporting misconduct, participating in investigations, raising safety concerns, requesting reasonable accommodations, engaging in protected labor activity, or exercising rights protected by law or University policy."

10. New Section – Employee Wellness

Proposed Addition:

"The University recognizes the importance of employee wellness and encourages utilization of counseling, peer-support, employee assistance, and mental health resources. Seeking such support shall not, by itself, constitute evidence of unfitness for duty."

University of California – Systemwide Police Policies

University of California

Page 1-1 University wide Police Policies and Administrative Procedures § 101.

Chapter 1:1301.00 GOVERNANCE & APPLICABILITY OF

SYSTEMWIDE POLICING POLICIES

Responsible Officer: EVP-COO UC Operations

Proposed Revisions to Policy 1301 – Governance & Applicability of Systemwide Policing Policies

Here are my suggestions:

1. Protection of Academic Freedom, Free Expression, and Shared Governance

Add the following statement to the Policy Summary or Policy Text:

"Nothing in these policies shall be construed to limit rights protected under University policy, Academic Senate regulations, collective bargaining agreements, state law, or the United States and California Constitutions, including academic freedom and freedom of expression."

2. Public Availability of Local Police Policies

Revise Section 1301.1.2 to require public access to local policies:

"All local police policies, general orders, procedural memoranda, and special orders shall be maintained in a publicly accessible format except where disclosure is prohibited by law."

3. Regular Policy Review with Stakeholder Input

Add a new provision:

"Systemwide policing policies shall be reviewed at least every five years, with opportunities for input from faculty, staff, students, and other campus stakeholders."

4. Clarification of the Authority of Local Policies

Revise the sentence:

"Policies and Procedures for campus police departments issued by authority of the Chief of Police shall have the same authority as these Systemwide Policing Policies."

to:

"Policies and Procedures for campus police departments issued by authority of the Chief of Police shall operate under and be consistent with these Systemwide Policing Policies."

5. Departmental Accountability and Compliance Review

Add a new provision:

"Each campus police department shall maintain procedures for reporting, reviewing, and addressing alleged violations of Systemwide or local policing policies."

6. Annual Systemwide Reporting

Add a new provision:

"The Office of Systemwide Community Safety shall provide periodic public reports regarding implementation of Systemwide policing policies, major policy revisions, and systemwide compliance trends."

These six revisions would strengthen transparency, accountability, shared governance, and consistency across the University while preserving the operational intent of the policy.