



University of Pennsylvania Police Department 4040 Chestnut Street, Philadelphia, Pa 19104		 
Directive: 36	Subject: Personnel Early Warning System	Effective Date: 03/05/2002
Order of: Gary Williams, Chief of Police		Amended Date: 08/01/2023

I. Purpose

The purpose of this directive is to establish and outline the University of Pennsylvania’s Personnel Early Warning System. The early identification of potential problem employees and a menu of remedial actions can increase agency accountability and offer employees a better opportunity to meet the department’s values and mission statement.

II. Policy

It shall be the policy of the UPPD that this comprehensive Early Warning System be initiated when certain types of incidents occur; and that first-line supervisors conduct evaluations of the factors that may have caused these incidents to occur. Additionally, as necessary, supervisors should recognize the actions of officers that could potentially lead not only to disciplinary action, but to referral to the University’s Employee Assistance Program.

III. Scope

This directive shall affect all sworn police officers.

IV. Procedures

A. Criteria for Initiating Supervisory Review

1. The UPPD Personnel Early Warning System will be initiated when, in any previous twelve-month period, an officer is directly involved in:
 - a. Three (3) Use of Force Incidents (of any type); or
 - b. Three (3) Vehicle Pursuits (initiated by the officer); or
 - c. Three (3) Complaints (citizen and/or internal complaints); or
 - d. Five (5) combinations of any of the above events.

- e. In addition to the above, should an officer be served with a Protection from Abuse (PFA) order, be arrested or charged with a criminal offense, or be the subject of a domestic violence complaint, the Personnel Early Warning System will be initiated as soon as the department is made aware of the incident.
2. The methodology for keeping a record for each officer in the department will be through the use of the "Supervisory Tracking Form" (UPPD-104). This form will be maintained for each officer by a sergeant on each shift designated by the Shift Commander. Whenever an officer is involved in any of the above-mentioned events, the designated sergeant will notate the date and other pertinent information on the "Supervisory Tracking Form". When any of the triggers as mentioned in Section IV.A.1 in this directive occur, an "Early Intervention Report" (UPPD-105) will be completed and the sergeant and Shift Commander will determine the appropriate course of action to be taken.

B. Early Intervention Report

1. The "Early Intervention Report" (UPPD-105) will serve to document the following information:
 - a. The specific criteria (type of incident, and date of incident) that warranted the intervention (as prescribed in Section IV.A.1 above);
 - b. A supervisory summary, limited to the specific facts of the incident, avoiding any rendering of conclusions or determinations as to the involved officer. The supervisor will sign and date the written summary;
 - c. A discussion between the sergeant and the involved officer, with the officer being provided the opportunity to make any written comments to determine any potential underlying factors that may have been present regarding the incidents in question. The officer will sign and date his or her comments;
 - d. A course of action to be determined. The course of action will be decided upon after the sergeant and the Shift Commander meet to discuss the facts and circumstances surrounding the intervention. The Shift Commander will sign off on the recommended course of action and the report will be forwarded through the chain of command to the Chief of Police. One or more of the following courses of action will be taken for every employee whose actions necessitate the completion of the "Early Intervention Report":
 - 1) No additional action or informal counseling;
 - 2) Formal counseling and/or corrective action (a detailed plan must be written and attached to the "Early Intervention Report");
 - 3) Formal monitoring for a minimum of twelve (12) weeks, with monthly progress reports submitted in memorandum form by the supervisor through the chain of command to the Chief of Police;

- 4) Mandatory training designed to improve the employee's skills;
- 5) Voluntary or mandatory referral to the University's Employee Assistance Program, and/or
- 6) Reassignment.

C. Post-Intervention Monitoring and Documentation

1. The shift sergeant(s) will monitor the employee after the completion of the "Early Intervention Report" for further activity that may warrant additional intervention.
2. When the supervisory review finds no issues of concern, no additional action is needed.
3. When action is warranted beyond informal counseling, the course of action taken and progress made by the employee will be documented by the immediate supervisor in the "Performance Improvement Plan" section of the employee's next performance evaluation.
4. Completed "Early Intervention Reports" generated by the Personnel Early Warning System will be confidentially maintained by the Chief of Police for a period of three years, separate from the employee's personnel file. At the end of three years, all documentation will be destroyed.

D. Annual Evaluation of the Early Warning System

1. On an annual basis, the Chief of Police will designate that an evaluation be conducted to determine the effectiveness of the system. The evaluation will document the number of interventions during the previous twelve months, the course of action taken for each intervention, and a progress report on the performance of each officer subsequent to the intervention.

E. The University Of Pennsylvania Employee Assistance Plan (EAP)

1. The Penn Employee Assistance Program (EAP) and Work & Family Services, provided by Human Resources through Penn Behavioral Health (PBH), offers benefits eligible University faculty and staff and their immediate family members with free, confidential counseling and referral services and assistance with dependent care challenges. It is designed to provide assistance with issues and challenges that may interfere with employee's personal or professional life. All of these services can be accessed by calling 1-866-799-2329 and specifying the nature of the call.
2. Services offered by the Penn EAP and Work & Family Services are designed to encourage employees to seek help with problems early on, before they significantly affect daily life or job performance, or to get help when challenges suddenly become unmanageable.

3. The University understands that confidentiality is crucial to encourage employees to seek help before a problem becomes a crisis, or to reverse a crisis in the making. Direct access to these services is specifically designed to enable employees to obtain services without a referral. PBH employs practices that assure confidentiality is maintained for all clients. All EAP and Work & Family Services discussions and records of personal problems are confidential. Additionally, all on-line communications related records are kept separate from the University. Therefore, employees need not be concerned about workplace privacy or impact on their jobs as a result of using these services. EAP and Work & Family Services counselors can explain the degree of privacy that the program provides by calling 1-866-799-2329 to discuss this, or during the telephone intake conversation or initial session.
4. For additional information, refer to the EAP web site at <http://www.healthadvocate.com/upenn> or contact EAP by email at EAPinfo@healthadvocate.com.

F. COMPLIANCE

Violations of this directive, or portions thereof, may result in disciplinary action.

G. OFFICERS ASSIGNED TO OTHER AGENCIES

Officers of this department assigned to or assisting other law enforcement agencies will be guided by this directive.

H. APPLICATION

This directive constitutes departmental policy, and is not intended to enlarge the employer's or employee's civil or criminal liability in any way. It shall not be construed as the creation of a higher legal standard of safety or care in an evidentiary sense with respect to third party claims insofar as the employer's or employee's legal duty as imposed by law. Violations of policy will only form the basis for departmental administrative sanctions. Violations of law will form the basis for civil and criminal sanctions in a recognized judicial setting.