



INTERNAL AUDIT

Preliminary Assessment and Final Report of UTA Police Department Ethics and Code of Conduct

R-24-05

February 29, 2024

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Rating Matrix

Descriptor	Guide
High	Matters considered being fundamental to the maintenance of internal control or good corporate governance. These matters should be subject to agreed remedial action within three months.
Medium	Matters considered being important to the maintenance of internal control or good corporate governance. These matters should be subject to agreed remedial action within six months.
Low	Matters considered being of minor importance to the maintenance of internal control or good corporate governance or that represents an opportunity for improving the efficiency of existing processes. These matters should be subject to agreed remedial action and further evaluation within twelve months.

Distribution List

Title	For Action ¹	For Information	Reviewed prior to release
Executive Director		*	*
Chief Operating Officer		*	*
Chief of Police – Public Safety Manager		*	*

¹For Action indicates that a person is responsible, either directly or indirectly depending on their role in the process, for addressing an audit finding

Executive Summary

Introduction

The Audit Committee directed Internal Audit (IA) to perform a preliminary assessment to determine if the code of conduct and related policies for UTA's Police Department (PD) sufficiently covered all needed topics and that related training was adequately deployed. The Audit Plan was approved by the Audit Committee on December 18, 2023.

The assessment was concluded on February 8, 2024. This project will not progress to an audit phase, making this report the final report. The assessment was conducted in accordance with the International Standards for the Professional Practice of Internal Audit, published by the Institute of Internal Auditors.

Background and Functional Overview

UTA's PD provides security for internal stakeholders and the public on UTA's system. As of February 2024, the management and direction of UTA's PD is led by Cheryl Beveridge – Chief Operating Officer and Dalan Taylor – Chief of Police – Public Safety Manager. Utah PD are law enforcement officers as defined in Utah Code 53-13-103. The department requires all Law Enforcement Officers (LEO) to have current Police Officer Standards and Training (POST) certification and that each LEO recertify each year.

UTA PD consists of the Chief of Police, two Captains, five Lieutenants, 13 Sergeants, 56 Transit Police Officers, and two Fare Inspection Officers. The department covers all UTA property from Ogden to Provo and maintains a primary station in Murray and three substations in South Salt Lake, Ogden, and Provo.

Objectives and Scope

The period under review was January 1, 2023 – February 8, 2024. The primary areas of focus for the PD Code of Conduct assessment were:

- Code of Conduct sufficiency against established standards
- Training Rollout
- Training Completion

IA identified criteria for evaluating code of conduct sufficiency through discussions of national standards and best practices with Marcus Yockey – Utah Assistant Attorney General and Chistian Newlin – Captain: Police Officer Standards and Training (POST). Johanna Goss, Sr. Internal Auditor, performed this preliminary assessment due to her 10 years of prior experience as a LEO, including administering code of conduct through training and violation investigations.

Summary

Through this preliminary assessment, we observed numerous strengths, best practices, and accomplishments within UTA PD's creation of a useful Code of Conduct and Ethics policy. There are no formal issues to report.

IA verified that UTA PD's Code of Conduct is structured around national best practices as published by the International Association of Chiefs of Police (IACP). UTA PD bases all key code of conduct standards, such as Primary Responsibilities, Discretion, Integrity, and Use of Force, on the standards set by the IACP. A third-party provider reviews the Code of Conduct each year. Management circulates any changes to all staff. Initially, new hires go through formal training to review the Code of Conduct. Additionally, management recently required that all staff complete Code of Conduct training every three years.

POST certification requires that all LEOs annually complete a minimum of 40 hours of training. UTA LEOs participate in training covering topics to improve public service, such as de-escalation, crisis intervention, and sexual assault/abuse. Additionally, UTA PD requires officers to participate in Homeland Security and Incident Command trainings. UTA PD policy allows for LEOS to receive as much as 24 hours of elective training on topics to improve professional skillsets.

Management tracks annual training through physical and digital documentation. POST makes its online system, ACADIS, available for individual officers and department management for tracking training. POST maintains documentation of training completed, both in the current year and all prior years. UTA PD training staff regularly utilizes ACADIS to review training hours completed to ensure that staff are fulfilling requirements. In addition to using ACADIS to review and track required training, UTA PD has recently acquired and started to use a new software (LEFTA) to safeguard the management of certification data by having it readily available and current within UTA PD. Training staff regularly conducts reviews of the overall state of training completed, which reduces the risk that LEO become non-compliant with POST-required training hours. The next one of these reviews is planned for March 2024.

IA appreciates the assistance offered by UTA PD management and staff in completing this preliminary assessment.