



OFFICE OF POLICE OVERSIGHT

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May 29, 2024

Robin Henderson, Interim Chief of Police
Austin Police Department
715 E. 8th Street
Austin, TX 78701

RE: OPO's Policy Recommendation to Austin Police Department's General Order
924.3.1: Hair

Dear Chief Henderson:

The purpose of this memorandum is to provide feedback and recommendations for improvement to the Austin Police Department's (APD) General Order (GO) 924: Personal Appearance Standards.

The specific policies reviewed in this memorandum are as follows:

- 924.3.1 Hair

This policy analysis and recommendation addresses the current policy's noncompliance with state and local law. In addition to prohibiting "extreme" styles such as spiked or partially shaven hair, APD's policy lays out conditions for employees who wear dreadlocks, twists, and braids. In restricting hairstyles traditionally worn by Black people, APD violates Texas' CROWN Act¹ and Austin Ordinance No. 20220609-043² (Austin CROWN), which protects against any workplace policies that discriminate based on natural hair texture or protective hairstyles.

Many police departments nationwide in jurisdictions, both with and without CROWN Act legislation in place, model race-neutral hair policies: Philadelphia PD³ and New York PD,⁴ for example. The OPO believes that APD's policy on this can be refined to better align with nationwide best practices. We look forward to addressing the items identified and improving these policies to benefit the community and APD's sworn personnel.

Sincerely,

Gail McCant, Director
Office of Police Oversight

¹ CROWN Act, HB 567, 88(R) (2023) <https://capitol.texas.gov/BillLookup/Text.aspx?LegSess=88R&Bill=HB567>.

² Austin, TX., Ordinance No. 20220609-043 (2022), [20220609-043, Ordinance](https://www.austintexas.gov/ordinance/20220609-043).

³ "Philadelphia Police Department Directives, 6.7: Uniforms and Equipment" n.d. Accessed March 15, 2024 <https://www.phillypolice.com/directives/>

⁴ "General Regulations, Procedure No: 304-07 Personal Appearance" n.d. Accessed March 15, 2024. <https://www.nyc.gov/site/nypd/about/about-nypd/manual.page>



924.3.1 Hair

Recommendation #1:

OPO recommends that APD amend 924.3.1 (a) Male Sworn Employees

OPO analysis indicates a need to remove restrictions to race-based hairstyles from APD's Hair policy for male sworn employees as demonstrated below.

(a) Male Sworn Employees

1. Hair must not extend below the top edge of the uniform collar while assuming a normal stance and shall not interfere with the wearing of any issued headgear. A medical exemption is required for any deviation from this order. The medical exemption process should follow 924.2.4 (a) 1-3 and also state the reason for the deviation.

~~2. Dreadlocks, twists, and braids shall conform to uniform standards and shall be kept clean and neat. They must be proportionate in size, no larger than ½ inch in diameter, and tightly woven to present a neat, professional appearance.~~

3. Decorative items will not be worn in the hair.

Recommendation #2:

OPO recommends that APD amend 924.3.1 (b) Female Sworn Employees

OPO analysis indicates a need to remove restrictions to race-based hairstyles from APD's Hair policy for female sworn employees as demonstrated below. Subsequently, all example photos currently used in this section of policy depicting hairstyles for female sworn employees should be removed as they are unduly restrictive.

(b) Female Sworn Employees

1. Hair must not extend below the bottom line of the back yoke of the uniform shirt (or comparable area on a shirt without a yoke) and shall not interfere with the wearing of any issued headgear.

2. Hair clasps or barrettes may be worn but must correspond with the colors of the uniform, employee's hair color or rank insignia. Decorative items will not be worn in the hair.

~~3. Dreadlocks, twists, and braids shall conform to uniform standards and shall be kept clean and neat. They must be proportionate in size, no larger than ½ inch in diameter, and tightly woven to present a neat, professional appearance.~~

4. Hairpieces or wigs shall not pose a safety hazard and shall present a natural appearance, as well as conform to the grooming standards set forth in this policy.



Recommendation #3:

OPO recommends that APD revise 924.3.1 to provide clear definitions

OPO analysis indicates a need to clarify the meaning of the word “extreme” in this section of policy when referring to acceptable and unacceptable hairstyles for civilian and sworn employees. APD should outline specific qualities and reasoning as to what is not allowed instead of merely providing a list of examples.

