A Case Study on The Use of Force Among Police Patrol

MARK ANTHONY L REFUGIO, MSCrim

Emilio Aguinaldo College (EAC) refugiomarkanthony27@gmail.com

Abstract — This study was primarily an investigation into the police personnel's factors, suspect's situational factors, and organization's working environment and their relation to the police personnel's use of reasonable force. In particular, this study sought to answer the following basic question, "What are the factors that generally enter into police officer's decision to use force? Are there any specific clues or cues before enforcing force?"

From the results of the study, it may be concluded that use of force is more likely to occur when the four (4) indicators, further identified as provocative behavior of suspects or disobedience, attempts to flee or physically resisting arrest, being under the influence of alcohol, and interpersonal disturbance or mentally ill person, were present during the police-suspect encounters.

Based on the findings of this study, the following recommendations are proposed: (1) It is recommended to review various accountability structures already implemented by the Philippine National Police; (2)It would also be helpful to understand the term 'police suspect' encounters better; (3) A council or a department should be established that would monitor the trends and changes upon the implementation of the reformed and reexamined internal cleansing; (4) It is also recommended to increase the number of participants when conducting a further study in either qualitative or quantitative approach; (5) Lastly, additional parameters on the likelihood of use of police force on suspect's resistance should be considered in future studies.

Keywords — Use of Force, Police Patrol Personnel, Suspect, Arrest

Introduction

Human rights are every individual's fundamental rights against the state or any other public authority. The rights of an individual in police custody are protected basically by the 1987 Philippine Constitution. It is an admitted fact that when the Police interrogate suspects in a crime, they employ methods outside the limitations provided by the Philippine Constitution. It is not a new issue when the newspapers and the media platforms cover matters involving police officers violating the rules. It may include the use of unreasonable force or commonly known torture either by not recording the arrest or deprivation of liberty in the guise of a prolonged interrogation.



There are several instances where the police personnel, entrusted with the duty to enforce law and order, violate human rights. It is an admitted fact that when the Police interrogate suspects in a crime, they employ methods outside the limitations provided by the Philippine Constitution. It is not a new issue when the newspapers and the media platforms cover matters involving police officers violating the rules. It may include the use of unreasonable force or commonly known torture either by not recording the arrest or deprivation of liberty in the guise of a prolonged interrogation.

The authority to use force, including lethal force, is a defining feature of the police profession (Griffiths, 2013a). A police officer's decision to use power carries significant consequences and significant impact on the community and for all involved and is arguably the most heavily scrutinized aspect of modern police work. Situations involving the use of force are often characterized by a rapidly evolving scenario, complex environment, considerable uncertainty, and a potentially high degree of fear (Murphy, 2014). These factors make it extremely challenging for officers to decide when and how to act.

The context of whether the use of force may be necessary or sensible versus when it becomes imprudent and over-the-top remains be one of the primary issues that confront the police force. While most of the connections of Police and civilians were diplomatic, there are instances that the execution of power may be necessary.

This study gave insights as to how to address this concern by the community, especially it has been the prevalent issue in the Philippines after President Rodrigo Roa Duterte had taken over the administration. Most of the studies and researchers have emphasized using surveys to measure the correlation between the factors. However, in this study, the researcher had taken a new approach by interviewing and conducting focus group discussions to have a more personal understanding of the perceptions of the police personnel of Talomo Police Station of Davao City Police Office on the use of reasonable force.

Literature Review

Police safety and use of force decisions during critical incidents are an ongoing source of concern for both police practitioners and the public (Andersen et al., 2016). In a study conducted by the U.S. Department of Justice, threats of force were included in the use of force statistics (Hyland, Langton, & Davis, 2015). Under Minnesota law, deadly force is any force used to cause death or great bodily harm.

In a study conducted by Bengtson (2017), she cited that the Department of Justice found that there was 715,500 nonfatal use of force accounts from 2002 to 2011 (Hyland, Langton & Davis, 2015). Relatively few police-citizen encounters result in the use of force. Of all encounters with Police, only 1.6% resulted in police use of nonfatal force (Hyland, Langton, & Davis, 2015). Even though Police use force relatively less than how often police encounter citizens,





approximately 13% of citizens believed Police properly acted when force was used. When force was not used, 89% of citizens had positive perceptions of Police (Hyland, Langton, & Davis, 2015).

Apaza (2017) cited that police academies follow paramilitary-based training where recruits endure physical and psychological demands (Reaves, 2013). These stress-based training are intended for police officers to manage high levels of stress, such as life-threatening incidents that requires a deadly force response by Police. The most stressful aspects of policing involve the use of force. Therefore, force training is an essential aspect of the police academy (Apaza, 2017).

The distinction between reasonable and excessive use of force is central for legal requirements and professional standards; officers should use only the minimum amount of force considered reasonable according to the seriousness of the threat, with departmental discipline or even legal prosecution warranted for unjustifiable use of force (Prenzler, Porter, & Alpert, 2013).

Officers most likely use force due to verbal or physical subject resistance (Rojek, Alpert,& Smith, 2012). In addition, Bengtson (2017) cited, Individuals with serious mental illness are sixteen times more likely to be killed by Police than subjects without mental illness (Fuller, Lamb, Biasotti & Snook, 2015). This may be due to stigmas surrounding violence and mental illness and officers being ill-prepared to handle a crisis involving mental illness. Crisis Intervention Team training is a popular model for officers in de-escalation techniques for individuals with mental illness, but research provides little consensus on how effective the training is.

One of the central issues concerning Police's use of force is how to define the boundary between when power may be necessary or reasonable versus when it becomes excessive (Griffiths, 2013a). While it was commonly observed, especially in the Philippine-Davao setting, that most interactions between Police and civilians are peaceful, there were instances where force may be necessary. The Supreme Court has held that an objective reasonableness standard should apply to claims that police officers used excessive force. Even under an objective reasonableness standard, quantifying the appropriate amount of power in a given situation can be complicated and debatable (United States Commission on Civil Rights, 2018).

Methodology

This study was primarily an investigation into the police personnel's factors, suspect's situational factors, and their relation to the police personnel's use of force during the encounter or legitimate operation. It is a case study design that provided a precise analysis of the identified factors and indicators that influence the use of force among Police Patrol Personnel of Talomo Police Station (PS3). A case study research was an appropriate tool to understand how the respondents perceived the 'use of force' during police operations and encounters.



The qualitative interviews averaged about 15 to 20 minutes. The interviews and discussions were recorded on a digital recorder and supplemented with field notes. Tape-recorded interviews were transcribed verbatim and integrated with all field-notes. The respondents were also informed that the data collected from the interviews would remain stored and confidential.

Results and Discussion

The study was conducted within the area of Talomo Police Station (PS3) jurisdiction under Davao City Police Office (DCPO) with a total strength of 166 personnel and with the ranks Patrolman to Police Major. The researcher selected this station because it is the station that holds the largest area of responsibility and is highly populated, being the center of the business district, shopping, entertainment destination, and residential areas. Figure 1 presents the Location Map of this conducted study.



This figure presents the deployment of the Police Patrol Personnel within Talomo District. Figure 1. Location Map of the Conducted Study



Table 1. Frequency and Percentage Distribution of the Police Patrol Personnel's Profile

Variables			f	Percent (%)
Rank	Patrolman / Patrolwoman (Pat)		1	10
	Police Corporal (PCpl)		7	70
	Police Staff Sergeant (PSSg)		1	10
	Police Master Sergeant (PMSg)		1	10
		Total	10	100.0
Age	21 - 30 years old		6	60
	31 - 40 years old		4	40
		Total	10	100.0
Sex	MALE		7	70
	FEMALE		3	30
		Total	10	100.0
Number of Years in	1 5 years		8	80
Service	1 - 5 years			
	6 - 10 years		1	10
	11 - 15 years		1	10
		Total	10	100.0

In terms of Rank, the data gathered indicates that most of the study respondents have a rank of Police Corporal (PCpl). This is evident in Table 1 that 70% or 7 out of 10 Police Patrol Personnel surveyed are Police Corporal (PCpl). It was expected since most of the Police non-commissioned officers deployed by the station as police patrol personnel have ranks of Police Corporal.

In terms of age, 60% or 6 out of 10Police Patrol Personnel ages 21-30 years old. This was evident since 70% of the participants have ranks of Police Corporal. In a study conducted by Bengtson (2017), younger officers are more likely to use coercive behaviors, such as force, than their older counterparts.

In terms of Sex, 7 or 70% of the respondents were male, while only 3 or 30% were female. This signifies that the organization has deployed more male Police Patrol Personnel than females. In a study conducted by Bengtson (2017), he cited that studies are inconclusive on if female and male officers use similar levels of force.

In terms of the Number of Years in Service, 80% of Police Patrol Personnel have been inservice for 1 to 5 years. Most of the participants, or 70% of the total Police Patrol Personnel, have ranks of Police Corporal or recently in the service. Thus, the findings were consistent with the previous results. Bengtson (2017) cited that in one study looking at internal investigations of the use of force, officers who were younger and had less policing experience were more likely to use force.



Question 1. How long have you been a Police Patrol Officer?

Most of the participants have been in the service for more than four years as non-commissioned police officers. This personnel engaged in this line of work or deployed as Police Patrol Officer for an average of 5 to 6 years. Their assignment as Police Patrol Officer had a wide range of responsibilities which includes community relations, facilitating 'know your rights' in the community, providing legal aid and direct service to the community, "first responders" that interview and gather information after encounters happen, providing political education to young people impacted, working with people who lost people in custody, public safety, and law enforcement and maintenance of law and order.

In a study conducted by Bengtson (2017), younger officers are more likely to use coercive behaviors, such as force, than their older counterparts.

Question 2. Talk to me about your experience as an officer in the use of force encounters.

The purpose of this question was to get a sense of the various forms of force used by the Police Patrol Personnel to perform their duties, including verbal, physical, and psychological. The researcher wanted to consider the impact that these experiences may have had on the participants, which could directly build insight and discernment into how they believed it could impact others.

Bengtson (2017) cited that in one study looking at internal investigations of the use of force, officers who were younger and had less policing experience were more likely to use power.

All ten (10) participants recalled experiences of enforcing the use of force in the performance of their official duties. All participants identified some form of resistance from the suspect upon enforcement and conduct of arrest. This ranged from refusal to submit to a search. The suspect resists or seriously disobeys the police personnel and willful disobedience from lawful order from the police personnel.

Participant shared a similar perspective on her experience of one incident wherein she and her team were conducting an arrest for a suspect of Batas Pambansa Blg 6 also known as *An Act Reducing The Penalty For Illegal Possession Of Bladed, Pointed Or Blunt Weapons, And For Other Purposes, Amending For The Purpose Presidential Decree Numbered Nine.* In that instance, the suspect was resisting, shoving, and pushing the hands of the said officer while she was placing him under arrest for violation of BP Blg 6.

Question 3. Discuss the factors that generally enter into a police officer's decision to use force. Are there any specific clues or cues that you look at before enforcing power?

This question was posed to identify and gather information from the Police Patrol Personnel the trends in policing as to the use of force in the performance of their official duties.





The researcher also utilized this question to ponder how important this issue is to Police Patrol Personnel and how it would significantly impact the Philippine National Police organization as to how this personnel perceives the use of force in the performance of their official duties.

The use of force among Police Patrol Personnel appears to be unrelated to the personnel's characteristics, such as age, gender, and Rank. In the individual interview conducted with each participant, all ten (10) participants have agreed that the use of force is more likely to occur when police personnel is dealing with persons under the influence of alcohol or drugs or with mentally ill individuals.

Participant 8 have also recalled an incident where they decided not to immediately employ force even though the suspect was holding a bladed weapon.

Also, situations most likely to involve police use of force are interpersonal disturbance and violent personal crime, and situations when suspects attempt to flee or physically resist arrest. Andersen et al. (2016) stated that A fight or flight response is an instinctual response and happens automatically, without a person deciding whether to have one. Vascular processes directed by adrenal hormones (e.g., epinephrine and cortisol) stimulate automatic reactions in the brain called the hindbrain. Automated instinctual processes are significantly faster than information processed in the pre-frontal cortex, an area of the brain required for memory, decision-making, and logical thought.

All the participants concluded that the most common type of force used was the use of hands and arms, wherein in those instances, which requires the person to grab or hold the suspects. There were no statistically significant differences in the level of force used by male and female officers.

Participants 1 and 6 have indicated a particular behavior from the suspects that gives them cues for using force. In her interview conducted, she stated what she identified as "provocative behavior" such as threatening the officer, assaulting the officer, arguing with the officer, interfering with the arrest of someone else, blocking or interfering with an officer's movement, trying to escape, resisting being handcuffed, and resisting being placed in a police vehicle.

Participant 2 provided two (2) factors which he considers in enforcing force, "For me, I only consider two factors in enforcing force: first, the cooperativeness of the respondent and the second factor is the risk of the situation. The specific clues or cues that I consider when I enforce or use force is the cooperation of the suspect."

On the other hand, Participant 5 indicated external factors that give them indicators to employ force upon the performance of their official functions and duties. These external factors include the suspects' disposition upon arrest, such as circumstances when the suspects appear to be under the influence of alcohol or drugs and when civilians appear to suffer from serious mental or emotional impairments.





In a study conducted by Garner et al. (2002), he concluded that alcohol impairment by suspects was a consistent predictor of police use of force, while drug impairment predicted increased use of force for some but not all measures of use of force.

Question 4. How does the work environment impact an officer's decision-making regarding the use of force?

This question was posed to identify if the workplace environment, which includes the location of the work such as office or site of construction and the condition of the workplace impacts the disposition of Police Patrol Police Personnel towards the performance of their official duties.

Most of the participants have indicated a negative impact of the working environment to the use of force among Police Patrol Personnel, considering that the scope of their area of responsibility is a City, unlike in other provinces. They have indicated a possibility of use of force when placed in hostile regions. Yet, it is a rare incident and mostly never exists considering that they are deployed in urban areas such as Davao City.

Question 5. Talk to me about the different types of situations in which you use force.

This question was posed to gather information through the experiences of the participants as Police Patrol Personnel to recognize and acknowledge other forms and factors that may relate to the use of force among police personnel in the performance of their official functions and duties.

In his study, Murphy (2014) stated that a rapidly evolving scenario, complex environment, considerable uncertainty, and a potentially high degree of fear often characterize situations involving the use of force. These factors make it extremely challenging for officers to decide when and how to act.

In addition, officers most likely use force due to verbal or physical subject resistance (Rojek, Alpert,& Smith, 2012). Bengtson (2017) cited, individuals with serious mental illness are sixteen times more likely to be killed by Police than subjects without mental illness (Fuller, Lamb, Biasotti & Snook, 2015).

All participants have agreed that there most likely to use force when pursuing a suspect and attempting to exercise their arrest powers. These incidents transpired when there is resistance from the suspects that increases the possibility of using force. Patrol Police Personnel are mandated to use force when circumstances provide for the necessity to enforce the law or protect themselves or others from harm.



In the interview, most of the participants have indicated using some form of weaponless tactic, and the most frequent tactic involved only grabbing. This is evident since, according to the participants, they have most likely employed hands and arms to keep the suspects under control.

All of the participants have also agreed that the term "use of force" should be used with caution as it should not always be equated to "improper," "abusive," "illegitimate," and "unnecessary" use of force.

Question 6. Has police in-service training affected your decision-making in using force as a police patrol officer?

Police in-service training is considered an internal factor that could affect the use of force among Police Patrol Officers in their official functions and duties. Police training starts in the academy, where the concept of officer safety is so heavily emphasized that it takes on almost religious significance.

All participants have indicated that most of their training revolves around four (4) primary areas: policy interpretation, human relations and rights, conflict management, and tactics for the proficient use of weapons. These trainings define and influence the police patrol officer's level of control, commonly known as "maximum tolerance." Also, these trainings include strategies to create time, space, and distance to reduce the likelihood that force will be necessary. Yet these trainings have a negative impact on the decision of police patrol officers to enforce the use of force.

The interview resulted in a positive effect of police in-service training on the use of force among police patrol personnel to perform their functions and official duties.

All of the participants have also concluded that external factors, which include the suspects' disposition upon arrests, such as circumstances when the suspects appear to be under the influence of alcohol or drugs and when civilians appear to suffer from serious mental or emotional impairments, greatly affect their decision in employing force in the implementation of the order and law.

However, Participant 8 has indicated otherwise; the decision as to the employment of force on the suspects can be explained by their number of years in the service and experience in law enforcement and not on their training.

Question 7. Identify your biggest challenge as a police patrol personnel during operations.

The participants have come to the identification and conclusion that there were several issues and challenges that they usually faced as police patrol officers. The common issues include active response to the community, rapid response to calls for service, significant area characteristics (e.g., local neighborhoods, major shopping centers), and the various suspects'



disposition upon arrest, such as circumstances when the suspects appear to be under the influence of alcohol or drugs and when civilians appear to suffer from serious mental or emotional impairments, or instances where the suspects are in "provocative behavior" such as threatening the officer, assaulting the officer, arguing with the officer, interfering with the arrest of someone else, blocking or interfering with an officer's movement, trying to escape, resisting being handcuffed, and resisting being placed in a police vehicle.

Suspect's Profile and Responses

Typically, the suspect's physical traits (e.g., gender, age, etc.) are also considered when a level of force is decidedly used or not used by a law enforcement officer. Suppose the suspect is not able to be handled safely with the appropriate level of force. In that case, an officer is trained not to initiate the power until the situation is leveled by either the arrival of additional officers or a level of cooperation from the suspect. (Avdija, 2013)

The study involved interviews from five (5) individual participants of Suspects who are detained in Talomo Police Station (PS3). Participants were first asked about their Age, Sex, resistance upon arrest, and disposition upon arrest (e.g., alcohol, drugs, etc.). Table 2 showed the summary of the suspect's profile.

Table 2. Frequency and Percentage Distribution of the Suspect's Profile

Variables			f	Percent (%)
Age	21 - 30 years old		2	40
	31 - 40 years old		3	60
		Total	5	100.0
Sex	Male		5	100
	Female		0	0
		Total	5	100.0
Resistance upon Arrest	Yes		5	5
	No		0	0
		Total	5	100.0
Under the Influence upon	Alcohol		2	20
Arrest	Alcohol		2	20
	Drugs		0	0
	None		3	80
		Total	5	100.0



Table 2 showed that 60% or 3 out of 5suspects ages from 31 - 40 years old. In a study conducted by Avdija (2013), he concluded that the suspect's age, in which some studies proposed, that a younger suspect is more likely to receive some form of police force than an older suspect.

In terms of Sex, Table 9 showed that all of the participants were male. Avdija (2013) stated that the more significant and one of the few undisputed influencing factors on police use of force was the suspect's gender. Research showed that male suspects were more likely to have power used against them during a police-suspect encounter than female suspects.

In terms of Resistance upon Arrest, all five (5) suspects or 100% of the participants have not resisted upon their apprehension. Avdija (2013) have also stated that the two most likely characteristics of the suspect that will determine the level of force or likelihood of police use of force is a suspect's behavior (e.g., assaultive behavior or being visibly upset) and a suspect's level of resistance during a police-suspect encounter. Research showed that disrespect towards the engaged officer increased the chances of force being used during the meeting.

Question 1. What was the offense charged against you?

All of the participants were of different and various offenses charges against them. Participant A was charged with Homicide with Robbery, participant B with Trespassing, participant C with violation against RA 9165, participant D with Rape, and participant E with violation against RA 8479. Table 10 showed the transcription of the participants' responses to the question:

Question 2. Were you under the influence of drugs or liquor during your arrest?

Only 2 out of 5 suspects or 20% of the participants were influenced by either alcohol or illegal drugs upon arrest. At the same time, the other participants have stipulated otherwise.

Participant 2, who was arrested for Other Forms of Trespass under Article 281 of the Revised Penal Code, was found positive in the liquor test, which was evident in his medical results for being under the influence of alcoholic beverages. Yet, in his interview, he did not resist upon arrest and submitted himself to the authorities.

Participant 4, who was arrested for violation of Republic Act 8353, known as "The Anti-Rape Law of 1997," was found to be under the influence of alcohol when he was arrested.

The remaining three (3) participants have indicated that they were neither under the influence of drugs nor alcohol upon their arrest.



Question 3. You resist the arrest, and how?

There are at least ten different types of recognized resistance in criminal law, and each falls into two categories (passive and active resistance). Physical assault on an officer is active resistance, and it is subject to penalties of its own. Turning one's back on a police officer and ignoring him is non-responsive resistance. The division between passive and active resistance is typically determined in court when the prevailing circumstances of the situation are weighed: what, when, how, why, and where (Roufa, 2019).

None of the participants have indicated that they resisted during their arrest. Participant 3 had only shown his innocence from the crime, and wherein he contended that he was not part of the offense charged against him.

Various researchers also considered the disposition of the suspects during their arrest. Considering these factors, the alcohol on their system had added fuel to their assaultive or provocative behavior rooted upon their belief that they allegedly did not commit the crime. Thus, resisting through arguing and unwillingness to be handcuff by the arresting authorities or police patrol personnel.

Participant 2, who was arrested for violation of Article 281 of the Revised Penal Code, also known as *Other Forms of Trespassing*, has indicated that he did not resist during his arrest by the police patrol officer. However, during his arrest, he attempted to escape the arresting authorities or police patrol officer by running away from the scene of the crime incident.

Neither of the two (2) participants have stipulated that an excessive force such as use of gun or weapon was employed by the arresting officer or police patrol officer during their arrest.

Question 4. Did the Police read to you your rights during the arrest?

All of the participants have stipulated that the arresting officer had neither informed them of their constitutional right to remain silent and that any statement they make could be used for or against them in any court of the law. Instead, they were asked if they have their own counsel.

Question 5. What were your contentions or objections during your arrest, if there's any?

Out of the five (5) suspects who participated in the interview, three (3) of them neither object nor have any contentions concerning their apprehension. Participant 4 even admitted the offense he committed.

However, Participant 3 and 5 have expressed their contentions concerning their apprehension. These participants have stipulated a typical response during their arrest. In the very first instance or during their actual arrest, they have allegedly specified that they did not commit



such crime accused of them. This is their first response when confronted by the police patrol officer.

Question 6. Did the Police apply force upon the arrest? If there is any, what kind of force?

Out of the five (5) suspects who participated in this study, only one (1) participant had experienced untoward behavior from the arresting officer. During his arrest, Participant 3 disclosed that he was smacked on his head and forced to submit himself to the authorities.

Though all participants had stipulated that the arresting officers have employed or have used their hands and arms upon grabbing or when they were held for their arrest, none of them viewed this as excessive use of force.

None of the participants have indicated that excessive force was applied upon their arrest. It was evident then that reasonable force was employed only enough effort to constrain the suspect without using what would be considered deadly force such as a chokehold, strike to the head with a weapon, a knee on the neck, etc.

Conclusion

As to the Police Patrol Personnel who participated in this study, all of them have experience or have faced issues and situations concerning enforcement of the use of force in the performance of their official duties. Participants have indicated that 'Resistance' ranged from refusal to submit to a search, the suspect resists or seriously disobeys the police personnel and willful disobedience from lawful order from the police personnel.

All ten (10) participants or Police Patrol Personnel who participated have agreed that the use of force is more likely to occur when police personnel is dealing with persons under the influence of alcohol or drugs or with mentally ill individuals.

All of the Police Patrol Personnel participants concluded that the most common type of force used was the use of hands and arms, wherein in those instances, which requires the personnel to grab or hold the suspects. There were no statistically significant differences in the level of force used by male and female officers.

They have indicated some form of weaponless tactic, and the most frequent tactic involved only grabbing. This is evident since, according to the participants, they have most likely employed hands and arms to keep the suspects under control.

Police Patrol Officers often used more than one verbal tactic or physical control tactic during operation or patrolling activities. Situations involving the attempt to flee, obstructing evidence, or violent responses by the suspects are the common factors that triggered the use of



force or the deciding elements in using force among police patrol personnel. Initially, calm suspects were least likely to resist officers. Suspects who were reportedly impaired by alcohol or drugs were no more likely to resist officers than sober suspects. And lastly, the most common type of force used by officers was the use of hands and arms, as evident from the interviews and discussions of the police patrol officers.

Most of the Police Patrol Personnel participants have indicated a negative impact of the working environment to the use of force among Police Patrol Personnel considering that the scope of their area of responsibility is a City, unlike in other provinces. They have indicated a possibility of use of force when placed in hostile regions. Yet, it is a rare incident and mostly never exists considering that they are deployed in urban areas such as Davao City.

The interview resulted in a positive effect of police in-service training on the use of force among police patrol personnel to perform their functions and official duties.

Out of the five (5) suspects who participated in this study, only one (1) participant had experienced untoward behavior from the arresting officer. Though all participants had stipulated that the arresting officers have employed or have used their hands and arms upon grabbing or when they were held for their arrest, none of them viewed this as excessive use of force.

References

- Andersen, J. & Gustafsberg, H. (2016). A Training Method to Improve Police Use of Force Decision Making: A Randomized Controlled Trial, © SAGE
- Apaza, C. E. (2017). Perceptions on Police Use of Force: A General Strain Theory Approach to Explicate Use of Force Incidents. InBSU Master's Theses and Projects. Item 55.
- Avdija, A. S. (2013). Police Use of Force: An Analysis of Factors that Affect Police Officer's Decision to Use Force on Suspects. International Research Journal of Social Sciences, Vol. 2(9), 1-6, September (2013).
- Bengtson, K. (2017). Bad cops or bad training? How police officertraining impacts use of force incidents. Departmental Honors Projects. 60.
- Chandrasekar, K. (2011). Workplace Environment and Its Impact Organizational Performance in Public Sector organizations. International Journal of Enterprise Computing and Business Systems, 1(1), 1-19.
- Department of Labor and Employment, Labor Codes of the Philippines, Article 83 of the Labor Code, Book Three Conditions Of Employment Title I Working Conditions And Rest Periods Chapter I Hours Of Work.



- Fuller, D.A., Lamb, H.R., Biasotti, M. & Snook, J. (2015). Overlooked in the undercounted: The role of mental illness in fatal law enforcement encounters. Treatment Advocacy Center
- Griffiths, C.T. (2013a). Canadian Police Work: Third edition. Toronto ON: Nelson Education Ltd.
- Hays, Z. (2011). Police Use of Excessive Force in Disorganized Neighborhoods. El Paso, TX:LFB Scholarly Publishing LLC.
- Human Rights Watch (2018). Philippines: End Police Abuses. New Police Chief Should Reject 'Drug War,' Ensure Independent Investigations. https://www.hrw.org/news/2018/06/27/philippines-end-police-abuses
- Hyland, S., Langton, L., & Davis, E. (2015). Police Use of Nonfatal Force, 2002-2011. U.S. Department of Justice.
- Javed, M. B. (2014). Determinants of Job Satisfaction and its Impact on Employee Performance and Turnover Intentions. International Journal of Learning & Development ISSN 2164-4063 20, The Islamia University of Bahawalpur.
- Kiruja EK, M. a. (2013). Linking Work Environment with Employee Performance in Public Middle Level TIVET Institutions in Keny. International Journal of Advances in Management and Economics, July August 2013, Vol. 2, Issue 4, 83-91.
- Media, F. (2017). Forbes.com. Muling kumuha mula sa Forbes.com: https://www.forbes.com/pictures/fjle45mkli/no-4-police-officer/#53de440a4c95/
- Murphy, J. J. (2014). Beyond a split-second: An exploratory study of Police Use of Force and Use of Force Training in Canada. © Simon Fraser University Summer 2014
- Philippine National Police Human Rights Affairs Office (2009). PNP Guidebook on Human Rights-Based Policing. Official Gazette.
- Philippine National Police Manual (2010). Philippine National Police Operational Procedures. PNPM-DO-DS-3-1.
- Prenzler, T. & Porter, L. & Alpert, G. (2013). Reducing police use of force: Case studies and prospects. Aggression and Violent Behavior. 18. 343–356. 10.1016/j.avb.2012.12.004.
- Raziq, Abdul, Maulabakhsh, Raheela, (2014). Impact of Working Environment on Job Satisfaction. Department of Management Sciences, Balochistan University of Information Technology, Engineering and Management Sciences Quetta, Pakistan. In 2nd Global Conference On Business, Economics, Management And Tourism, 30-31 October 2014, Prague, Czech Republic
- Reaves, B. A. (2013). State and Local Enforcement Training Academies. U.S. Department of Justice. Office of Justice Programs. Bureau of Justice Statistics, 1-20.



- Reynolds, P., Fitzgerald B. & Hicks, J. (2017). The Expendables: A Qualitative Study of Police Officers' Responses to Organizational Injustice. Police Quarterly 2018, Vol. 21(1) 3-29.
- Rojek, J., Alpert, G.P, & Smith, H.P. (2012). Examining officer and citizen accounts of Police use-of-force incidents. Crime & Delinquency, 58(2). 301-327.
- Roufa, T. (2019). The Definition of Active Resistance in Criminal Law. https://www.thebalancecareers.com/active-resistance-974690

Silvester, J. (2012). Defusing the 'death by cop' time bomb. The Age, 24.

United States Commission on Civil Rights (2018).

Wittie, M.C (2013). Police Use of Force. PB and J, Vol. 2 no. 1, 17