

## DEPARTMENTAL GENERAL ORDER 23-15

ST. LOUIS COUNTY POLICE DEPARTMENT  
OFFICE OF THE CHIEF OF POLICE

June 15, 2023

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Off-Duty Employment  
Part-Time Employment  
Request for Secondary Employment  
Secondary Employment

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### SECONDARY/OFF-DUTY EMPLOYMENT

#### I. PURPOSE

The purpose of this General Order is to establish regulations and procedures governing secondary employment privileges for Department personnel as provided by Article IV, Section 4.270.7 St. Louis County Charter, 1968.

#### II. GENERAL

The regulation of **any employment, worked by an employee outside of their primary responsibility to the Department**, is necessary to maintain an efficient organization that is mentally and physically alert. Public order and safety will thereby be better preserved. In addition, such regulation will prevent potential conflicts of interest and loss of public image because of the type of employment engaged in by Department personnel. **All employment, worked by an employee outside of their primary responsibility to the Department, is a privilege and not a right guaranteed by the Department.**

#### III. DEFINITIONS

- A. Conflict of interest means a conflict between a Department employee's personal interest (or the interest of his secondary employer) and the duty of the employee to the **County, the Police Department, and/or to the public.**
- B. Monetary Benefit is any reward provided by an employer that is financial in nature. These may include, but is not limited to, cash rewards, bonus components, commission, gift cards, and more.
- C. RollKall is the secondary employment management software.
- D. RollKall Department Liaison is the person designated by the Chief of Police to be responsible for approval of all secondary employment and compliance of all secondary employment policies and procedures.
- E. Secondary Employment shall be defined as any employment engaged in by any Department **commissioned employee** during off-duty hours, holidays, vacation, or recreation periods with any employer other than the St. Louis County Police Department, including a self-employed business **wherein the employee is receiving monetary benefits and is acting in a law enforcement capacity, requiring the use of police authority. Any secondary employment worked that brings discredit to the County or the Department may be subject to disciplinary action as stated in the Department's Conduct and Discipline Manual.**
- F. Secondary Employment Administrators are the individuals assigned to maintain the RollKall software and verify an employee's status to work secondary.

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- G. **Secondary Employment Coordinators** are authorized employees responsible for scheduling secondary employment, acting as the primary contact for a secondary employer, and for entry and maintenance of the secondary job in the RollKall system.
- H. **Off-Duty Employment** shall be defined as any employment engaged in by any Department employee during off-duty hours, holidays, vacation, or recreation periods with any employer other than the St. Louis County Police Department wherein the employee is not working in a law enforcement capacity, not involving the use of police authority. This type of employment will not be considered as secondary employment and does not need to be reported to the Department. Any job worked that is not in a law enforcement capacity but brings discredit to the County or the Department may be subject to disciplinary action as stated in the Department's Conduct and Discipline Manual. This employment should not interfere with the employee's primary duty to the Department.

**IV. RESPONSIBILITIES**

**A. Employee Responsibilities**

- 1. **Employees participating in secondary employment must have the RollKall application on their phone or be able to access the web-based version from a computer when it becomes available.**
- 2. **Commissioned employees, while engaged in secondary employment, shall *always* take proper action on any offense or condition of which *they* have, or acquire knowledge, and which normally would require police attention including arrest and the making of reports.**
- 3. **In all cases of secondary employment, the primary duty, obligation, and responsibility of a Department employee is at all times to the Department. Therefore, if Department employees are required to report to duty during off-duty days or to work overtime, secondary employment will not conflict with those primary duties to the Department.**
- 4. **Employees enrolling in secondary employment via the RollKall system will be expected to keep their RollKall profiles (i.e., rank, current assignment, etc.) up to date.**
- 5. **Employees are responsible for accurate reporting of all aspects of secondary employment through the RollKall system, including secondary employer, time worked, and location.**
- 6. **Though employees participating in off-duty employment are not responsible for tracking their time through the RollKall system, it is still the employee's responsibility to ensure off-duty employment does not affect their primary duty, obligation, and responsibility with the Department.**

**B. Supervisor Responsibilities**

- 1. **Supervisors will receive an annual verification alert for an employee under their supervision enrolling in the RollKall system. The supervisor shall review the employee's request and provide a response to authorize the employee for secondary employment as soon as possible.**

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2. Supervisors, when receiving an annual verification alert for an employee that is not under their supervision, will deny verification with the note, "Wrong Supervisor". It will then be the employee's responsibility to update their profile with their current supervisor, ensuring their immediate supervisor receives the verification alert.
3. Outside of annual verification, if a supervisor believes secondary employment is interfering with an employee's ability to adequately perform their primary duties, the supervisor will articulate those concerns and a recommendation in an ATS through the Chain of Command to the Chief for review.

**C. Secondary Employment Coordinator Responsibilities**

Coordinators are responsible for entering jobs where they are the primary scheduler into RollKall.

**D. Human Resources Responsibilities**

1. Human Resources, when receiving an annual verification alert for an employee, shall review the employee's status, and provide a response to authorize the employee for secondary employment as soon as possible.
2. Human Resources will be responsible for monitoring an employee's secondary status (active, pending, suspended) within the RollKall system.

**E. RollKall Department Liaison Responsibilities**

1. The RollKall Department Liaison will be responsible for coordinating and approving new jobs with RollKall.
2. The Liaison is responsible for reviewing applications for new employers and uploading the approval to Roll Kall.
3. If requested, the Liaison may verify employees are eligible to work. Businesses requesting a copy of employee security licenses may be provided with the original approval documentation for the job, and the employee's notice of annual reverification.
4. The RollKall Department Liaison shall complete an annual report to be sent to the Chief of Police. The report shall include:
  - a. The total number of employees working secondary employment Department wide; and
  - b. The total number of jobs worked Department wide; and
  - c. The total number of hours worked Department wide; and
  - d. A list of current secondary employers for review.

**IV. ELIGIBILITY**

- A. All Department commissioned employees who have completed Field Training are eligible to obtain secondary employment.

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- B. All Department employees are eligible to obtain off-duty employment. Any Department employee wishing to work off-duty employment during periods of paid parental leave, medical leave or leave in conjunction with an on-duty injury (including regularly scheduled days off that occur during the leave) must submit a memorandum through the chain of command to the Chief of Police for approval.
- C. All Department employees working off-duty employment that require the use of Department resources shall submit a memorandum through the chain of command to the Chief of Police for approval.
- D. The **RollKall Department Liaison** shall have final authority to either approve or deny a request for a **newly created** secondary employment **job**. If a request is denied, an employee may submit a memorandum through the chain of command seeking a review by the Chief.
- E. **The job approval (uploaded in RollKall) and the employee's annual verification shall act as the employee's security license.**
- F. Conflict of Interest/Removal of Assignment
  - 1. If, after a Department employee has **started** a secondary employment, **and** a conflict or imminent conflict arises between the employee's police duties and the interest of his secondary employer, the employee shall be removed from any case, investigation or other matter involving the secondary employer and another Department employee shall immediately be assigned to take the first employee's place on such case, investigation, or other matter.
  - 2. It shall be the duty of all Department employees to report to their supervising officers the fact of such a conflict or imminent conflict of interest. It shall also be the responsibility of all command and supervisory personnel to advise subordinate Department employees if they believe an actual or imminent conflict of interest exists or may exist. All cases of such actual or imminent conflict of interest shall also be reported forthwith, through the chain of command, to the **RollKall Department Liaison**.

V. REQUIREMENTS OF SECONDARY EMPLOYMENT

- A. The following rules and regulations shall govern all Department employees engaged in secondary employment. Violations thereof may result in cancellation, revocation, or suspension of secondary employment through the **RollKall system**. Any remedial action taken pursuant to the provisions of this Order shall not be considered as disciplinary action and shall not preclude the Chief of Police from taking formal disciplinary action in appropriate cases.
- B. The **RollKall Department Liaison** will consider all secondary employment on an individual basis. **Unless approval is granted by the Liaison**, no employee shall work:
  - 1. At any employment, or in any location, which will tend to bring the Department into disrepute or to reduce **their** efficiency or usefulness as a Department employee; and
  - 2. In any employment requiring any affiliation, membership or allegiance tending to influence **their** conduct in a manner inconsistent with the proper discharge of duties as a police officer or with loyalty to the Department or in the public interest; and

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3. In police uniform at the performance of tasks other than **in a law enforcement capacity, requiring the use of police authority**, and then only in or on such premises or places as are approved by the **RollKall Department Liaison**; and
4. In any business or location where the manufacture, transportation or sale of alcoholic beverages or beer by the drink is the principal business; and
5. In any employment involving the towing of vehicles, emergency ambulance service (does not include volunteer firefighter/paramedic services) or as a taxicab driver or for any business or service that has a contract with St. Louis County; and
6. In any employment requiring the service of civil process either full or part time; and
7. On investigations or other work in which the employee may avail **themselves** of access to police information, records, files or correspondence as a private investigator or private detective or in any other capacity where the primary purpose of such employment is to gather information for, or appear as a witness in, a civil or criminal action; and
8. For any other **government agency** at a police task; and
9. For a business or company that is on strike (see Department General Order, Labor-Management Disputes); and
10. **More than** a total of 16 hours per day unless it is followed by an approved day of leave; **and**

Example: Police Officer Doe has worked a 12-hour shift on Wednesday, Officer Doe will not be allowed to work **more than** an additional 4 hours of secondary on Wednesday.

Example: Police Office Doe has worked a 12-hour shift on Thursday with an **approved day of leave on Friday**, Officer Doe may work **more than an additional 4 hours of secondary on Thursday**.

11. **More than** 72 hours per calendar week, including regular assignment, overtime, and secondary employment; and

Example: Police Officer Doe has a total of 72 hours they can work during the calendar week, and they have already worked 50 hours for the Department, they will then be allowed to work 22 hours at secondary employment during the week.

12. In any secondary employment during duty hours; including the scheduling of other employees for secondary employment.

- C. Secondary employment is prohibited during **periods of paid parental leave**, medical leave or leave in conjunction with an on-duty injury (including regularly scheduled days off that occur during the leave) until the employee has reported back to duty.
- D. Secondary employment is also prohibited if the employee is suspended with or without pay.
- E. St. Louis County Government will not reimburse employees engaged in those activities related to arrests made during secondary employment, including court appearances, warrant application and report writing where secondary employment consists of performing a police task.
- F. Injuries sustained by employees during any secondary employment may not be compensable by **St. Louis** County.

**VI. APPLICATION**

**A. Annual Employee Verification Process**

1. The annual employee verification process is prompted by RollKall based on the initial date of verification of the employee.
2. RollKall will send an email to the employee's supervisor, which is identified by the employee in their RollKall profile, to verify an employee's active status and current assignment are correct.
3. The supervisor will review the employee's status and current assignment and provide a response as soon as possible.
  - a. If the supervisor verifies an employee's status and current assignment as accurate, an email will be sent to Human Resources to verify eligibility.
  - b. Supervisors receiving an email to verify an employee not currently under their span of control should refer to section IV.B.2 of this order.
4. Human Resources will review the employee's status to ensure eligibility.
  - a. If the employee is approved, the verification process is complete, and the employee's status does not change.
  - b. If the employee is denied, Human Resources shall provide a reason in the notification sent to the employee.
5. If an employee feels they have been unjustly denied verification, they may appeal to the Chief by Department ATS.

**B. Job Approval**

1. Prior to a new secondary employer being made available in RollKall, the new secondary employer must be approved by the RollKall Department Liaison.
2. Department Form 145 shall be completed by the job coordinator or RollKall representative and sent to the RollKall Department Liaison.
3. If the job is approved, the Secondary Employment Coordinator or RollKall shall enter the job information in the RollKall system, including a copy of the signed approval.

**VII. CLOCK IN/CLOCK OUT**

The RollKall system provides a precise location screenshot when an employee clocks into and out of a job using the RollKall app. The RollKall system does not have the capability to GPS track an employee's location throughout the duration of a secondary assignment. Coordinators have the ability to set geographical parameters for each job created.

**VIII. RADIO USE DURING SECONDARY EMPLOYMENT**

***Department General Order 23-15, "Secondary/Off-Duty Employment"***

- A. If an officer chooses to **make the Bureau of Communications aware of their status during secondary employment, they** would be required to log on as S(DSN), i.e., S1234, as their call sign and provide the secondary location, **and** the duty hours. Officers working secondary who choose to call out **their status** will be required to call out **off-duty** at the end of their secondary duty hours.
- B. Officers should not assume that if they hit their alert tones, the dispatcher will know where they are if they did not call out at their current location.
- C. The Bureau of Communications will log officers working secondary into CAD using the nature code "SCNDRY". All officers working secondary will be assigned to the CAD zone "secondary". All radio positions will be responsible for monitoring the secondary zone.
- D. Multiple Officers working at a large-scale event may request the use of a predetermined enforcement talk group or they may utilize the direct talk groups (7TAC51, 7TAC52, or 7TAC53) for car-to-car communications. Enforcement channels will not be monitored by a dispatcher. When a dispatcher is requested for large scale events the officer coordinating must complete the Bureau of Communications Special Event Form.

Adopted by Command Staff

By order of:

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COLONEL KENNETH GREGORY  
Chief of Police

KG:jl

**Attachments**

[RollKall Instruction Manual](#)  
[Department Form F-145 Secondary Employer Request](#)

Approved at the regular meeting of the Board of Police Commissioners dated June 15, 2023.

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COMMISSIONER  
Chair

\_\_\_\_\_  
COMMISSIONER  
Secretary

Distribution  
All Department Personnel

CALEA Reference  
22.3.4; 22.3.5