



# St. Louis Metropolitan Police Department Surveillance Use Plan



## **SURVEILLANCE TECHNOLOGY:**

Body Worn Cameras and In-Car Cameras

## **DESCRIPTION:**

*Information describing the surveillance technology and how it works, including product descriptions from manufacturers*

The St. Louis Metropolitan Police Department utilizes Body Worn Cameras and In-Car Cameras to record police interactions with the public and provide more transparency around police-citizen interactions.

## **PURPOSE:**

*What specific purpose(s) the surveillance technology is intended to advance*

These devices are used to provide true accounts of officer-civilian interactions. BWCs and ICCs are also used in documenting scenes, such as crime scenes, accident scenes, or other events like the seizure of property and documenting the custody of such property. These devices allow officers to document interviews, statements, and events during an investigation to assist with the prosecution of cases.

It should be noted that BWCs and ICCs can only provide a limited view of an incident and other available evidence must be taken into consideration to have a clearer picture of the entire incident, such as witness statements, officer interviews, forensic analysis and other available technology resources. It has also been determined in various studies that the use of BWCs and ICCs help reduce the number of complaints filed against police officers, increase police accountability, and increase transparency resulting in enhanced public trust.

## **AUTHORIZED USE(S):**

*For what specific capabilities and uses of the surveillance technology is authorization being sought, including amounts, to be acquired and deployed, expected geographic areas and durations, organizational partnerships, and Memorandums of Understanding (MOUs) and:*

- 1) SLMPD is requesting the continued use of these technologies to record/document officer-civilian interactions.
- 2) SLMPD currently has 800 BWCs and 200 ICCs. The department will be purchasing 1000 BWCs and 300 ICCs to outfit every armed employee and patrol vehicle. Currently around 600 commissioned officers are equipped with body cameras.
- 3) Every officer and every patrol vehicle will be equipped with this technology.
- 4) SLMPD does not have any organizational MOUs or partnerships for these technologies.



# St. Louis Metropolitan Police Department Surveillance Use Plan



**a) *What legal and procedural rules will govern each authorized use, including where an application of Surveillance Technology requires a warrant?***

These technologies are governed by SO 5-33, which has been attached and can be found at <https://slmpd.org/wp-content/uploads/2024/03/BodyWornCameraAndInCarCameraSystem.pdf>. The use of the BWCs and ICCs are for law enforcement purposes and officer-civilian interactions.

**b) *What potential uses of the surveillance technology will be expressly prohibited?***

BWCs and ICCs shall not be used for personal reasons.

**c) *How and under what circumstances will surveillance data that was collected, captured, recorded, or intercepted by the surveillance technology be analyzed and reviewed?***

The use of these technologies are governed by SO 5-33, and circumstances on how and when data can be reviewed are mentioned in Section N (Reviewing BWC/ICC Recordings).

The data recorded by this technology is “accessed only for legitimate law enforcement purposes,” out of public view. Recordings should be reviewed prior to testifying in court for a case, and in cases not being investigated by FIU, data may be reviewed in preparation of any incident report. Investigators may review BWC/ICC, for official criminal or administrative investigations.

Supervisors will review BWC/ICC recordings that are related to non-FIU BlueTeam reportable incidents; incidents related to vehicle pursuits; incidents related to an employee’s on-duty injury; or to determine discipline.

Officers are prohibited from viewing BWC/ICC recordings for incidents being investigated by FIU, until a Voluntary Statement is made to FIU. When an officer does review the BWC/ICC for an FIU investigation, it will be done in the presence of the FIU investigator.

## **DEPLOYMENT:**

***If the surveillance technology will not be uniformly deployed or targeted throughout the city, what factors will be used to determine the specific geographic targeting, and what measures will be taken to ensure such targeting is racially and economically neutral.***

All officers will be equipped with BWCs and all patrol vehicles will be equipped with ICCs.

## **COST:**

***The fiscal impact of the surveillance technology, including costs of technology acquisition, operation, maintenance, personnel, and data storage, as well as all sources of funding and donations.***



# St. Louis Metropolitan Police Department Surveillance Use Plan



The currently BWCs cost \$1,157,600 and the ICCs cost \$752,600. The new BWCs cost \$1,053,862.50 and the ICCs cost \$4,362,405.00. These costs include all maintenance and data storage for the contract period of 5 years.

## **DISCRIMINATORY IMPACT AVOIDANCE:**

*What specific, affirmative measures will be implemented to safeguard the public from the potential discriminatory impacts of the technology, including without limitation what measures will be used to avoid biases in surveillance targeting and data collection?*

The measures taken to avoid potential discriminatory impacts of the technology is that the technology is assigned to all officers and all fleet vehicles.

## **DATA COLLECTION:**

*a) What types of surveillance data will be collected, captured, recorded, intercepted, or retained by the surveillance technology?*

The data obtained from these technologies include video and audio. Additionally, ICCs can alert the RTCC to LPR hits as described in the ALPR Surveillance Use Plan.

*b) What surveillance data may be inadvertently collected during the authorized uses of the surveillance technology, and what measures will be taken to minimize the inadvertent collection of data?*

When data is inadvertently collected during the authorized use of this technology, the officer will notify the BWC Unit for the video to be flagged for proper redaction of the inadvertently collected data.

Measures taken to minimize the inadvertent collection of data is having audible alerts to advise the officer that recording has begun. BWC are automatically activated when the officer is near a Priority 1 or Priority 2 call, when the vehicle's light bar is activated, when the vehicle speed is 70mph, when the driver's doors is opened while the light bar is activated, when the officer is lying down for more than 15 seconds, when the officer begins running or when the officer draws their departmentally issued firearm. Officers can also manually activate their BWC.

ICC are automatically activated when the vehicle is near a Priority 1 call, the vehicles light bar is activated, the vehicles speed is 70 mph, the shotgun is removed from the shotgun rack, or the driver's door is opened while the light bar is activated.

*c) How inadvertently collected surveillance data is be expeditiously identified and deleted?*

It is the responsibility of the officer to make the notification to the Commander of the Body Worn Camera Unit to advise if data has been collected inadvertently. There are daily audits of recordings conducted to ensure the recordings are properly classified, that recordings are flagged that have



# St. Louis Metropolitan Police Department Surveillance Use Plan



captured sensitive or normally prohibited content, and to ensure the proper functioning and use of BWC/ICC equipment and to perform a general quality review of agency operations.

**d) *How the City Entity will ensure that, when it retains surveillance data, such retention will comply with the Missouri Records Retention Schedule?***

SLMPDs retention of BWC and ICC data is determined by the officer's classification of the type of incident. The classification of an incident means the type of crime or civilian-officer interaction. Retention of each recording is tied to the assigned classification, which corresponds to the State of Missouri's Police Records Retention Schedule.

## **DATA PROTECTION:**

***What safeguards will be used to protect surveillance data from unauthorized access, including encryption and access control mechanisms, and what protocols will be put in place to authorize access and monitor who has access.***

The data can only be accessed through a controlled system that keeps a log of the user accessing the data. Commissioned personnel all can access data related to BWC/ICC, but their access has various permission levels. Officers have permission to review their recorded data for reporting purposes or court purposes, supervisors have access to review data for disciplinary reasons and have access to personnel assigned to them, the BWC Unit can access all data to ensure compliance with policies/procedures and to conduct daily audits. The amount of access and protocols for access to the data is governed by SO 5-33.

## **DATA RETENTION:**

***What rules and procedures will govern the retention and deletion of surveillance data, including how it will be ensured that the schedule for retaining and deleting aligns with the guidelines specified in RSMo 109.200-109.310 and how data collected by the City Entity as a result of the use of surveillance technology shall be stored in a manner such that it cannot be modified, destroyed, accessed or purged contrary to the Missouri Police Clerks Records Retention Schedule.***

SLMPDs retention of BWC and ICC data is determined by the officer's classification of the incident. Retention of each recording is tied to the assigned classification, which corresponds to the State of Missouri's Police Records Retention Schedule.

## **SURVEILLANCE DATA SHARING:**

***If a city entity is seeking authorization to share access to surveillance technology or surveillance data with any other persons, city entities, or governmental entities, it shall detail:***

- a) *Which persons, city entities, or other governmental entities will be approved for (i) surveillance technology sharing, and for (ii) surveillance data sharing;***



# St. Louis Metropolitan Police Department Surveillance Use Plan



Only SLMPD employees are authorized to review data from BWCs or ICCS.

**b) *How much sharing is necessary for the stated purpose and use of the surveillance technology;***  
No sharing is necessary for the use of this technology. All BWC/ICC recordings are considered a record and are the exclusive property of the Department. Accessing, copying, or releasing recordings for non-law enforcement purposes is prohibited, unless otherwise required by law or in conformance with other provisions of SO 5-33.

**c) *How will it ensure any person, city entity, or governmental entity approved for access to the surveillance technology or surveillance data complies with the applicable Surveillance Use Plan and does not further disclose the surveillance data to unauthorized persons and entities.***

Only SLMPD employees are authorized access to review the data from BWCs or ICCs. Any violation of SO 5-33 will lead to disciplinary actions.

## DEMANDS FOR ACCESS TO SURVEILLANCE DATA:

***What legal standard must be met by government entities or third parties seeking or demanding access to surveillance data.***

Data part of an investigation is loaded into the case file for the incident as evidence. As stated in SO 5-33 all BWC and ICC recordings are considered a record and the property of the Department. Sharing is prohibited unless required by law.

## TRAINING:

***What training procedures will be implemented to ensure compliance with this ordinance, the Revised Code of the City of St. Louis, and applicable federal and state laws and regulations.***

All personnel are trained in departmentally issued equipment. The BWC Unit is responsible for the training of BWC and ICC usage for all employees. There is no annual training related to the use of BWC/ICC, unless there are legal updates, at which time the entire department will be provided with the training by the BWC Unit.

## AUDITING AND OVERSIGHT:

***What mechanisms will be implemented to ensure the Surveillance Use Plan is followed, included what independent or non-independent persons or entities will be given oversight authority, and what legally enforceable sanctions will be put in place for violations of the Plan?***

BWCs and ICCs are overseen by the BWC Unit, who conducts daily audits to ensure compliance with departmental policies, per SO 5-33.



# St. Louis Metropolitan Police Department Surveillance Use Plan



## COMPLAINTS:

*What procedures will be put in place by which members of the public can register complaints or concerns, submit questions about the deployment or use of a specific surveillance technology, and how the city entity will ensure each question and complaint is responded to in a timely manner.*

Complaints about surveillance technology can be made to the Civilian Oversight Board using the Joint Citizen Complaint Form which can be located [here](#).

Residents are also able to make comments about surveillance technology by contacting the Citizens Service Bureau (314) 622-4800.