St. Louis Metropolitan Police Department
Surveillance Use Plan

SURVEILLANCE TECHNOLOGY:

Cameras

DESCRIPTION:

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

The Saint Louis Metropolitan Police Department utilizes various forms of cameras to assist in public safety in the community. Cameras are key tools in deterring crime, advancing criminal investigations, protecting the property of our community, and other law enforcement purposes.

PURPOSE:

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

Cameras assist law enforcement with many things including deterring criminal activity, reducing the fear of crime, identifying criminal activity and suspects, and gathering evidence for criminal proceedings. Cameras also document actions of law enforcement, locate missing persons, assist with monitoring high risk incidents, monitoring transportation networks (such as the Metrolink), and help officials keep residents informed of possible environmental hazards, like severe storms or threats to public safety.

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 the cameras to continue to assist with public safety, criminal investigations and transparency.

2) SLMPD currently owns 646 fixed cameras, 47 mobile trailers, 2 air support downlink videos and 2 SWAT Unmanned Aircraft Systems.

3) The technology is deployed all over the city of Saint Louis. The fixed cameras are identifiable by the red and blue lights. The mobile trailers are deployed at the discretion of the district commander based on crime trends, requests from residents and alderpersons, or because of an increase in the type of crime. The air support downlink videos are deployed for active criminal investigations, including car pursuits, and the SWAT Unmanned Aircraft Systems are deployed during the execution of a search warrant.

4) SLMPD has MOUs with other entities, such as residents, business and special taxing districts, that want to share their private video footage with the department to increase the visual footprint

within the City of Saint Louis. SLMPD does not share data back with these entities, it is only one direction in data sharing.

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

The Saint Louis Metropolitan Police Department follows SO 5-31 in reference to Video Surveillance and Directive 2019-12-16 in reference to Mobile Surveillance Trailers. Both policies are attached and can be found on the slmpd.org website.

Video Surveillance
https://slmpd.org/wp-content/uploads/2024/03/VideoSurveillance.pdf

Directive 2019-12-16 in reference to Mobile Surveillance Trailers
https://slmpd.org/wp-content/uploads/2024/03/MobileSurveillanceTrailers.pdf

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

Video Surveillance is only used for legitimate law enforcement activities, any violation of that would result in discipline as stated in SO 5-31.

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 is governed by SO 5-31. The video surveillance collected by the system is analyzed and reviewed for criminal investigations. Any information obtained through the video surveillance system will be used exclusively for safety, security, and law enforcement purposes. Data is retained for days and are automatically deleted by the system after this period unless it is retained as evidence in an active criminal investigations.

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.

Deployment of video surveillance cameras throughout the City of Saint Louis are heavily dependent on existing infrastructure such as power and data connectivity. The availability of these resources can limit the deployment of these devices. The SLMPD also relies on private partnerships which allows the linking of the privately owned cameras that can be connected into the SLMPD's Real Time Crime Center.

In addition, cameras can be requested by communities through their Alderpersons to help in the deterrence of criminal activity within their communities.

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.

The following has been spent on video surveillance:

- $237,748 in ARPA Grant funds for SLMPD Cameras
- $70,000 in General Funds for DPS Cameras
- $119,300 by the Police Foundation for SLMPD Cameras
- $1,653,470.80 in APRA Grant funds for Mobile Trailer Cameras
- $240,520.62 in Operation Legend Grant funds for Mobile Trailer Cameras
- $78,750.00 in Operation Legend Grant funds for SLMPD Cameras
- $78,859 in Street Division Refuse Grant funds for Environmental Investigations Unit Cameras

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 deployed citywide, in conjunction with crime trends, community suggestions or concerns provided by Alderpersons, or at community meetings.

DATA COLLECTION:

a) *What types of surveillance data will be collected, captured, recorded, intercepted, or retained by the surveillance technology?*
   Data collected is either visual recordings or still photos.

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?*
   Video recordings are only retained for 30 days and are automatically deleted by the system after this period unless it's seized as evidence in an active criminal investigation. Due to the amount of data obtained daily, video is only reviewed in connection with an investigation after specific details are provided such as date and time frame.

c) *How inadvertently collected surveillance data is be expeditiously identified and deleted?*
   The process of video purging is automated and only recorded video that has been retained as evidence is retained beyond the 30 days.

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

All recordings are retained for 30 days, after which they are automatically deleted by the system, unless they are connected to an active criminal investigation and being retained as evidence of a crime.

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.

Only authorized personnel have access to the system. There is user specific login information to access the system to ensure all personnel are held accountable to their use of the system and what is accessed in the system. Any violation of authorized use of the system will result in disciplinary action as mentioned in SO 5-31.

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.

Video recordings are only retained for 30 days as governed by RSMO 109.200 – 109.310 and all recordings are automatically deleted by the system after this period unless it's seized as evidence in an active criminal investigation. The SLMPD complies with the Missouri 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;*

Only SLMPD commissioned personnel, City IT Division and City Traffic Division have access to the system and every individual has unique login credentials.

b) How much sharing is necessary for the stated purpose and use of the surveillance technology;

No sharing of the data is necessary, unless it is linked to a criminal investigation as it relates to legal proceedings being pursued by SLMPD.

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 unauthorize persons and entities.

Every user of the system utilizes unique login credentials for their access. All information is logged and audited by the Intelligence Unit. Any violation of the authorized system will result in disciplinary action in accordance with SO 5-31.

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 obtained by the system is not authorized to be released or accessed by other entities, unless related to the prosecution of a criminal case.

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 with access to the system are trained in its usage and must comply with SO 5-31. The Commander of the Intelligence Unit is responsible for ensuring compliance with all training, related to the use of this technology.

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?

The Commander of the Intelligence Unit oversees the RTCC and is responsible for ensuring compliance with all policies and procedures related to the video surveillance system.

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.