



# St. Louis Metropolitan Police Department Surveillance Use Plan



## **SURVEILLANCE TECHNOLOGY:**

Automated License Plate Recognition System (ALPR or LPR)

## **DESCRIPTION:**

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

The Saint Louis Metropolitan Police Department Automated License Plate Recognition (ALPR) System is a computer-based system that utilizes fixed, and vehicle mounted units to take digital images of a license plate on vehicles during day or night. These units are installed at traffic intersections throughout the City of Saint Louis and in 14 SLMPD marked patrol vehicles. The LPR processes information based on two angled images taken of each vehicle and the information is then compared to a list of stolen or wanted motor vehicles in conjunction with felony crimes.

## **PURPOSE:**

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

The ALPR System is to assist officers with on-going criminal investigations, apprehension of wanted persons/vehicles, recovering stolen property for crime victims, and assisting with criminal investigations related to missing or endangered persons.

The specific technology is only utilized for the above stated purposes.

## **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 use of ALPR/LPR's with on-going criminal investigations, apprehension of wanted persons/vehicles, recovering stolen property for crime victims, and assisting with criminal investigations related to missing or endangered persons.
  - 2) SLMPD has 404 LPR's fixed at intersections within the city that SLMPD manages and 14 installed within SLMPD marked vehicles.
  - 3) SLMPD currently integrates LPR's within the RTCC.
  - 4) SLMPD does not have any organizational partnerships for this technology.
- a) What legal and procedural rules will govern each authorized use, including where an application of Surveillance Technology requires a warrant?*



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There are currently 404 fixed LPR units managed by the Saint Louis Metropolitan Police Department, along with 14 equipped vehicles. These units are deployed throughout the City of Saint Louis. The use of the ALPR System is restricted to legitimate law enforcement purposes related to criminal investigations.

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

The usage of this technology is restricted to legitimate law enforcement purposes as it relates to criminal investigations and the technology is strictly used to advance active investigations and public safety for all. SLMPD does not utilize this technology to track individuals based on personal beliefs or political views. The RTCC only receives alerts on vehicles that are wanted as part of a felony investigation or have been stolen.

**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 data generated by the ALPR is retained for 90 days and is automatically deleted after that period. This technology only captures digital images of the license plates on vehicles to compare against a list of stolen or wanted vehicles for felony violations. No other data is collected or generated by this technology.

#### 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.***

ALPR units are deployed to supplement the video camera system and are dependent on existing city infrastructure of fiber connectivity and power. These unit are deployed throughout the city to assist with criminal investigations and placed in areas with high traffic volume. ALPR equipped vehicles are distributed equally throughout the patrol districts with two vehicles assigned for specialized enforcement.

#### 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.***

ALPR units are primarily purchased by the City of Saint Louis' Board of Public Service. 87 fixed units were purchased by the Saint Louis Police Foundation for a cost of approximate \$4,000 each. All ALPR vehicles were funded by the by the Saint Louis Police Foundation with an approximate cost of \$16,000 per vehicle. Maintenance of this system is budgeted for by the department in the general fund.

#### 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?***



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This technology is deployed based on fiber connectivity and available resources near locations where the most vehicular traffic exists thereby increasing the chances of apprehending individual(s) involved in active criminal investigations.

Vehicles with this technology are equally distributed throughout the city.

## DATA COLLECTION:

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

Digital images are collected by this technology and deleted automatically after 90 days.

- 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?*

The units are specifically stationed to capture data on vehicles. No additional data, other than a digital image is collected or retained.

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

ALPR images are taken only when there is a vehicle detected by the camera. No other data (such as audio, cellular communication, microwaves, etc.) is captured. All data is automatically deleted after 90 days, unless it is seized as evidence in a criminal investigation.

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

SLMPD stores the vehicle license plate reads for a period of 90 days. After the 90 days the records are automatically purged. Retrieving records past this point is not possible. The SLMPD complies with the Missouri 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?*

Only SLMPD trained users can access the ALPR System for legitimate law enforcement activities related to criminal investigations. The technology is managed by the Commander of the Real-Time Crime Center.

## 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*



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*it cannot be modified, destroyed, accessed or purged contrary to the Missouri Police Clerks Records Retention Schedule?*

SLMPD stores the vehicle license plate reads for a period of 90 days. After the 90 days the records are automatically deleted and retrieving purged records is not possible.

## **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?*

SLMPD authorized personnel have access to the ALPR System.

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

No sharing of the data is necessary for the stated purpose and use of the surveillance technology.

*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?*

All search information related to the use of the ALPR system is logged and retained by the SLMPD. Every user has their own unique credentials to access the system. Any violation of the authorized use of the system will result in disciplinary action in accordance with SO 5-31. The data related to this technology as part of active criminal investigations, therefore, this does not prohibit mutual aid or assistance requests by other law enforcement agencies, as to not hinder those investigations. All requests made from other law enforcement agencies are handled in accordance with all federal and state laws.

## **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?*

SLMPD personnel are responsible for preventing third parties unauthorized access to information. Failure to adhere to the Department's Data Use Agreement may subject SLMPD personnel to disciplinary and/or criminal action.

SLMPD personnel must confirm the identity and affiliation of individuals requesting information from the SLMPD and determine that the release of information is lawful prior to disclosure. Unauthorized access of any system will subject employees to administrative and potentially criminal penalties.

## **TRAINING:**



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*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?*

SLMPD authorized personnel are trained in how to use and understand that information received using this technology. Any legal updates related to the use of technology is relayed through training conducted by the Academy personnel to ensure departmental compliance. The Commander of the Crime Control Strategies oversees the ALPR program and is responsible for ensuring officers are in compliance with the training requirements.

## 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 ALPR System platform for SLMPD is overseen by the Commander of the Crime Control Strategies.

Compliance with all SLMPD Policies and Procedures is monitored by the Bureau of Professional Standards.

## 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 found [here](#).

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