



# St. Louis Metropolitan Police Department Surveillance Use Plan



## SURVEILLANCE TECHNOLOGY:

Saint Louis Mugshot Recognition Technology (SMRT)

## DESCRIPTION:

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

The Saint Louis Mugshot Recognition Technology (SMRT) is a picture search technology, that works like the publicly available Google Image Search on the Internet. The system allows a digital image (picture) of a subject to be compared to a database of criminal mugshots and returns a list of possibly matches..

## PURPOSE:

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

The purpose of SMRT is to generate a list of possible persons (investigative leads) in active criminal investigations. The list is then reviewed by the investigating officer for further evaluation.

## 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 SMRT to continue to assist in developing leads in active criminal investigations and to continue assisting in closing cases for victims of crimes.
- 2) SLMPD currently has access to SMRT through the REJIS subscription.
- 3) The technology is deployed in active criminal investigations to create investigative leads.
- 4) SLMPD has access to this technology through the subscription with REJIS and the system is maintained by the St. Louis Fusion Center.

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

The Saint Louis Mugshot Recognition Technology is governed by SO 5-27, which is attached and can also be found on the slmpd.org website.

St. Louis Mugshot Recognition Technology

<https://slmpd.org/wp-content/uploads/2024/03/MugshotRecognitionTechnology.pdf>

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



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SMRT can only be accessed by commissioned personnel. Proper use of the technology is listed in SO 5-27.

**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 5-27. Data is reviewed by the requesting investigating officer or detective to determine if a positive identification can be made from the leads provided by the system.

## **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.*

The use of SMRT is for active criminal investigations and is not used based on geography.

## **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.*

There is no specific cost for the technology as it is part of the REJIS subscription. The subscription for REJIS is \$1,835,397.24 annually.

## **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 utilized for active criminal investigations. The technology is not deployed to specific geographic areas.

## **DATA COLLECTION:**

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

There is no surveillance data collected, captured, recorded, intercepted or retained by this technology. It is a comparison of a photo of an individual involved in an active investigation to a database of mugshots on file from prior criminal incidents.



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***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?***

This technology is used to compare a static image to a database. There is no data that is inadvertently collected during the authorized use of this technology because the data is being put into a system not collected from the system.

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

There is no inadvertently collected data that is collected by this technology.

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

All SMRT system data provided to the Saint Louis Fusion Center will be stored on the SMRT server for a period not to exceed ten (10) days after the date that the originating agency for each submitted image notifies the SMRT System Administrator that is no longer retains the mugshot in its records. Data Collection, Retention and Dissemination is addressed in SO 5-27.

## **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 information for the SMRT system is only accessible by commissioned personnel and is accessible only through the REJIS system.

## **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.***

All SMRT system data provided to or by the Saint Louis Fusion Center will be stored on the SMRT server for a period not to exceed ten (10) days after the date that the originating agency for each submitted image notifies the SMRT System Administrator that is no longer retains the mugshot in its records.

## **SURVEILLANCE DATA SHARING:**



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*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 have access to the information provided by the SMRT system.

- b) *How much sharing is necessary for the stated purpose and use of the surveillance technology;*  
Data is provided to the St. Louis Fusion Center

- 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 commissioned personnel have access to the system through REJIS.

## 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.*

This is part of the REJIS subscription and a way to develop investigative leads for an active criminal investigation.

## 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 5-27.

## 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 Commanders of commissioned personnel are responsible for ensuring their assigned personnel comply with all policies and procedures of the SLMPD. An additional layer of accountability is the Commander of the Intelligence Unit, who oversees the RTCC and is responsible for ensuring compliance with all policies and procedures related to the SMRT system.



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## 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.