



# 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 high speed-cameras and vehicle mounted camera 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 currently 14 SLMPD marked patrol vehicles (there is an RFP out that could affect the entire patrol fleet). 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.

ALPR technology is routed to the Real-Time Crime Center (RTCC). It should be noted that the RTCC is a part of the St. Louis Metropolitan Police Department and staffed by SLMPD personnel. The RTCC is a hub of surveillance technologies and does not fall under sharing for any surveillance technologies.

## **PURPOSE:**

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

The ALPR System is to assist officers with on-going felony 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 for on-going felony 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. There is a current RFP out seeking to equip all patrol fleet vehicles with in-car cameras which have the capability to capture license plates on vehicles and thus are also mobile license plate readers.
- 3) SLMPD currently integrates LPR's within the RTCC.



# St. Louis Metropolitan Police Department Surveillance Use Plan



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?***

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 on-going felony investigations, apprehension of wanted persons/vehicles, recovering stolen property for crime victims, and assisting with criminal investigations related to missing or endangered persons.

**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 felony investigations, apprehension of wanted person/vehicles, recovering stolen property for crime victims and assisting with criminal investigations related to missing or endangered persons. 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 captures (1) digital images of the license plates on vehicles to compare against a list of stolen or wanted vehicles for felony violations and (2) the location of the vehicle at the time of the notification of a LPR hit. 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. The deployment of this technology is restricted because it is dependent on the infrastructure resources available to support the technology, or changes to the current infrastructure to decrease the incident of damage to the technology. These units are deployed throughout the city, based on the infrastructure, to assist with investigations and placed in areas that experience high traffic volume during various times of the day. This is determined by data captured through traffic stops, overall understanding of traffic patterns, and comments/concerns from residents. The department does try to ensure deployment is evenly distributed throughout the city to the best of its ability to ensure coverage for all residents of the city.



# St. Louis Metropolitan Police Department Surveillance Use Plan

ALPR equipped vehicles are distributed equally throughout the patrol areas in the city, with two vehicles assigned for specialized enforcement. Supervisors should make every effort to deploy ALPR equipped vehicles on a regular basis.

The SLMPD strives to maintain the highest standards of honor and integrity. SLMPD is committed to building trust with all members of the community, by respecting and protecting the constitutional rights and dignity of all individuals during law enforcement contacts and/or enforcement actions. *See SLMPD Special Order 1-04 (Prohibition of Bias-Based Policing and Racial Profiling), SLMPD Special Order 1-08 (Interaction with Transgender Individuals), and SLMPD Directive 2021-08-27 (Consent Judgement Respecting Right to Assemble and Engage in Non-Violent Protest and Criticize, Complain About, and Video Record Police).*

## **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 approximately \$4,000 each. All ALPR vehicles were funded by the Saint Louis Police Foundation with an approximate cost of \$16,000 per vehicle. Maintenance of this system not budgeted for in the city's general fund, since repairs are not always anticipated, the department has used grant funding to repairs the LPR's which is approximately \$1,400 per unit.

## **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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## **DATA COLLECTION:**

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



# St. Louis Metropolitan Police Department Surveillance Use Plan



This technology captures (1) digital images of the license plates on vehicles to compare against a list of stolen or wanted vehicles for felony violations and (2) the location of the vehicle at the time of the notification of a LPR hit. No other data is collected or generated by this technology. The data collected is deleted 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 and their current location relative to the notification. No additional data, other than a digital image of the vehicle and the location at the time of the notification, is collected or retained.

***c) How inadvertently collected surveillance data is 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, at which time the data will be maintained as required by the State of Missouri Police Clerk's Retention Schedule as published by the Office of the Missouri Secretary of State.

***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 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 on-going felony investigations, apprehension of wanted persons/vehicles, recovering stolen property for crime victims, and assisting with criminal investigations related to missing or endangered persons. The technology is managed by the Commander of the Real-Time Crime Center and the security/access to the ALPR records is monitored and controlled by the department's Information Technology Unit.

ALPR records are considered closed under RSMO 610.100(3). Failure to properly follow the procedures outlined in the department's Special Order 5-27 could result in the loss of valuable evidence in a criminal prosecution and/or a significant risk to the department. Any loss of evidence under these circumstances could result in disciplinary action.

## 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***



# St. Louis Metropolitan Police Department Surveillance Use Plan



*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 90 days the records are automatically deleted and retrieving purged records is not possible. If data must be seized as evidence in a criminal investigation, the data will be maintained as required by the State of Missouri Police Clerk's Retention Schedule as published by the Office of the Missouri Secretary of State.

## **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, including those assigned to the Real-Time Crime Center, have access to the ALPR System. The SLMPD does not share its data with any other entities through an application. The system is internal and is managed and maintained internally.

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

ALPR records are the property of the department. Reproduction or dissemination of any APLR records outside of the SLMPD is strictly prohibited except as provided by Special Order 5-27 or with specific authorization from the Chief of Police or his/her designee. The department does allow for sharing with outside law enforcement agencies in an investigative function, but sharing is not 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 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 Special Order 5-27. The data related to this technology is part of on-going felony investigations, apprehension of wanted persons/vehicles, recovering stolen property for crime victims, and assisting with criminal investigations related to missing or endangered persons. Therefore, this does not prohibit mutual aid or assistance requests by other law enforcement agencies, so 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?*

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# St. Louis Metropolitan Police Department Surveillance Use Plan



Police or his/her designee. The department does allow for sharing with outside law enforcement agencies in an investigative function.

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## **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 SLMPD personnel authorized to use this system receive training in the operation of ALPR technology by the RTCC personnel and subject matter experts approved by the department.

All employees who utilize ALPR technology shall receive a copy of Special Order 5-27, along with instructions on constitutional protections and case law associated with the use of this technology.

Any legal updates related to the use of technology are relayed through training conducted by the Academy personnel to ensure departmental compliance.

The Commander of 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, including 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. The security of and access to the ALPR records will be monitored and controlled by Information Technology.

A list of personnel authorized to have access to the system is maintained by Information Technology, which ensures that the access to the ALPR system complies with federal, state, and local laws and departmental policies and procedures.

Compliance with all SLMPD Policies and Procedures is monitored by the Bureau of Professional Standards and failure to follow the procedures outlined in Special Order 5-27 or this use plan could result in disciplinary action.

## **COMPLAINTS:**





# St. Louis Metropolitan Police Department Surveillance Use Plan



*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.