



St. Louis Metropolitan Police Department Surveillance Use Plan



SURVEILLANCE TECHNOLOGY:

RTCC Video Surveillance System- Citywide Camera System

DESCRIPTION:

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

The Saint Louis Metropolitan Police Department has 646 fixed/stationary cameras deployed throughout the City of St. Louis, in areas that have the required infrastructure to support the technology. The RTCC Video Surveillance System cameras are considered an Internet Protocol (IP) video surveillance system. The IP video system utilizes data from a digital network to send and receive video signals. The camera data is directed to the Real-Time Crime Center and allow the SLMPD to obtain real-time and/or recorded visual information, aid in crime deterrence, reduce incident response times, provide archived video coverage for investigations and criminal prosecutions, enhance public and officer safety, and provide infrastructure security. 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.

The department also has access to third-party video (i.e., Special Taxing Districts and private citizens), which is managed by MOU's with private entities/citizens, to federate their cameras into the department's system. These are not considered a City Entity, by definition, in Ordinance 71842 or prohibited by the Ordinance under Section Two, subsection B, but for transparency the department is acknowledging that this access does exist.

The fixed cameras are highly visible cameras with red and blue flashing lights attached to the top, and a Police decal on the front of the box. They are capable of panning, tilting and zooming.

PURPOSE:

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

Cameras assist law enforcement with many things such as obtaining real-time and/or recorded visual information, aiding in crime deterrence, reducing incident response times, providing archived video coverage for investigations and criminal prosecutions, enhancing public and officer safety, and providing infrastructure security. 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.



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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 and has access to numerous private entity cameras that are federated into the Real-Time Crime Center.
- 3) The technology is deployed all over the City of Saint Louis. The fixed cameras are identifiable by the red and blue lights.
- 4) SLMPD has MOUs with other entities, such as residents, businesses 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. These are not considered a City Entity, by definition, in Ordinance 71842 or prohibited by the Ordinance under Section Two, subsection B, but for transparency the department is acknowledging that this access does exist.

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 the department's Special Order 5-31 in reference to Video Surveillance. The department oversees and coordinates the use and installation of video surveillance cameras in the City of St. Louis. The Police Commissioner or designee authorizes all video surveillance camera monitoring.

Any audio or video recording activities will be conducted in full compliance with the law. All authorized users will monitor the RTCC Video Surveillance System in a professional, ethical, and legal manner. Information obtained through video surveillance will be used exclusively for safety, security, and law enforcement purposes.

Each authorized user will log into the RTCC Video Surveillance System with their own credentials. Any unauthorized alterations to logon records will be a violation of Special Order 5-31. Anyone who engages in the unauthorized use or misuse of video surveillance cameras systems may be subject to criminal prosecution and/or administrative sanctions, including termination.

The department is authorized to enter into agreements with public and private entities to access and federate their video surveillance cameras into the RTCC system. Live public/private video feeds from cooperating entities may be monitored by department employees by are not recorded by the department. If the department enters into an agreement regarding access to a third-party video



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system or an outside governmental agency video system, with the terms that are more restrictive than this Special Order, employees will adhere to the more restrictive terms unless otherwise required by law.

Limitations identified in Special Order 5-31 may be suspended by the Police Commissioner or by the Director of Operations for the City of St. Louis when use of the RTCC Video Surveillance System is required to address an imminent threat to public safety, for purposes of national security, when compelled by court order, or when otherwise authorized by law. For any such suspension, the Police Commissioner or Director of Operations will make a written record of the date, time, length, and purpose of the suspension.

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

Authorized users will not use the RTCC Video Surveillance System to view private areas or use it in a manner that would violate a person's reasonable expectation of privacy, including viewing through windows of any public or private building.

Department employees will not monitor behavior based solely on characteristics of race, gender, ethnicity, skin color, national origin, pregnancy, citizenship, immigration status, sexual orientation, disability, or other protected class.

Authorized users will not pan, tilt, or zoom a camera to focus on an individual or use facial recognition software, unless there is a reasonable suspicion of criminal activity.

Authorized users will not allow any unauthorized persons to access the RTCC Video Surveillance System.

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 by personnel in the RTCC or investigators as part of criminal investigations and will only be used in non-criminal investigations where there is significant risk to public safety and/or property (e.g., events such as Fair St. Louis, St. Patrick's Day events, etc.) and authorized by the Police Commissioner or designee. Any information obtained through the video surveillance system will be used exclusively for safety, security, and law enforcement purposes. Recorded images that do not document specific incidents shall be kept confidential and destroyed on a regular basis. Such images will be retained for 30 days unless disclosure is otherwise required by the Sunshine Law, court order, or release is otherwise required by law. Retention of any recording beyond the time limit must receive written approval by the Police Commissioner.



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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 is heavily dependent on existing infrastructure such as power and data connectivity. The availability of these resources can limit the deployment of these devices. Fixed/stationary video surveillance cameras will only be placed in public areas and in locations selected by the department based on crime trends.

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

The SLMPD also relies on private partnerships which allow the linking of the privately owned cameras that can be connected into the SLMPD's Real Time Crime Center.

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
- \$78,750.00 in Operation Legend Grant funds for SLMPD Cameras

The continued maintenance cost the department approximately \$80,000 last fiscal year, which is not budgeted for in the city's general fund and was funded by the PSN grant. There are no additional costs related to this technology.

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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The SLMPD also relies on private partnerships which allow the linking of the privately owned cameras that can be connected into the SLMPD's Real Time Crime Center.

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).*

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 live feeds.

- 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?*

Inadvertently collected data is recorded images that do not document specific incidents shall be kept confidential and destroyed on a regular basis. Such images will be retained for 30 days unless disclosure is otherwise required by the Sunshine Law, court order, or release is otherwise required by law. Retention of any recording beyond the time limit must receive written approval by the Police Commissioner.

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

Such images will be retained for 30 days unless disclosure is otherwise required by the Sunshine Law, court order, or release is otherwise required by law. Retention of any recording beyond the time limit must receive written approval by the Police Commissioner.

- 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.



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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 for 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.

The video surveillance collected by the system is retained for 30 days unless disclosure is otherwise required by the Sunshine Law, court order, or release is otherwise required by law. Retention of any recording beyond the time limit must receive written approval by the Police Commissioner.

Requests for retention of recordings for investigative purposes must be directed to the Real-Time Crime Center and include the purpose, nature of the recording, and length of time for the retention. A physical copy of the recording will be made upon a written request for a law enforcement purpose. Recordings that have been designated as evidence, needed for civil litigation will be exported to a physical data storage device (for example a DVD, CD, USB flash drive, VHS tape, etc.) and will be submitted to the proper repository and handled in accordance with existing evidence handling procedures.

Data retained beyond 30 days complies with the Missouri Records 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;*

Only SLMPD commissioned personnel, City IT Division and City Traffic Division have access to the system and every individual has unique login credentials. There is no sharing with any entities that have MOUs to federate their systems into the RTCC.

- 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. Requests for retention of recordings for investigative purposes must be directed to the Real-Time Crime Center and include the purpose, nature of the recording, and length of time for the retention. A physical copy of the recording will be made upon a written request for a law enforcement purpose. Recordings that have been designated as



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- 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.**

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 required by the Sunshine Law, court order, or release is otherwise 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.

Police division staff involved with the City Video System/Video Surveillance System video monitoring will be appropriately trained and supervised in the responsible use of this technology. No staff other than those approved by the Intelligence Division Commander and trained in the use of the video surveillance system will operate the system at any time.

Police division staff using the video surveillance system shall be trained in the technical, legal and ethical parameters of appropriate use.

Documentation regarding training specific to the video surveillance system and equipment will be maintained by the supervisor of the RTCC.

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 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.



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Anyone who engages in the unauthorized use or misuse of video surveillance camera systems may be subject to criminal prosecution and/or administrative sanctions, including termination.

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.