



St. Louis Metropolitan Police Department Surveillance Use Plan



SURVEILLANCE TECHNOLOGY:

Situational Awareness Cameras- Air Support Cameras

DESCRIPTION:

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

The Saint Louis Metropolitan Police Department has access to cameras attached to the SLMPD Aviation Unit helicopter and drone cameras operated by the SLMPD Swat Team. Both units deploy their cameras for situational awareness during police related incidents. Situational awareness cameras are attached to equipment with aerial capabilities and enable law enforcement to assess potentially dangerous situations (i.e., barricaded situations, hazardous situation, or other compromised locations) from a safe location. Situational awareness cameras can also be used when attempting to locate at risk missing persons, such as juveniles or elderly persons with cognitive impairments, or attempting to locate fugitives who pose a threat to the overall safety of the community.

The use of situational awareness cameras allows the SLMPD Aviation Unit and Swat Team to gather critical information about a location before entry, providing additional safety and security to law enforcement, the subject(s) of the observation, and other members of the community in potentially dangerous situations.

The cameras on the helicopter have the capabilities of panning, tilting, and zooming. The camera on the helicopter has thermal imaging capabilities. The camera does not have the capability to record, but the live footage can be viewed using the air support downlink, when manually turned on by the Aviation Unit pilot. This camera is only authorized to be used and maintained by members of the Aviation Unit.

The cameras on the drone have the capabilities of panning, tilting and zooming. The drone camera has thermal imaging capabilities. The camera does not have the capability to record, and the live footage can only be viewed on the handheld remote control. The drone cameras are only authorized to be used and maintained by the members of the Swat Team.

PURPOSE:

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

Situational awareness cameras are attached to equipment with aerial capabilities and enable law enforcement to assess potentially dangerous situations (i.e., barricaded situations, hazardous situation, or other compromised locations) from a safe location. Situational awareness cameras can also be used when attempting to locate at risk missing persons, such as juveniles or elderly persons with cognitive impairments, or attempting to locate fugitives who pose a threat to the overall safety of the community.



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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 situational awareness cameras mounted on the helicopter utilized by the Aviation Unit and mounted to the drone utilized by the Swat Team, for the law enforcement related activities mentioned above.
- 2) SLMPD currently has access to 2 air support downlink videos and 2 drones.
- 3) The technology is deployed with the deployment of the Aviation Unit helicopter and the Swat Team.
- 4) SLMPD does not have any MOUs for either technology.

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 Police Commissioner or designee authorizes all video surveillance camera monitoring.

Any video recording activities will be conducted in full compliance with the law. Information obtained through video surveillance will be used exclusively for safety, security, and law enforcement purposes. The situational awareness cameras do not record any data and are only used for real-time awareness for the safety of law enforcement and any other parties involved in the situation.

The situational cameras are only authorized to be used by members who are trained and assigned to the SLMPD Aviation Unit or the SLMPD Swat Team. 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.

Situational awareness cameras must be used in a manner consistent with the requirements and protection of the Constitution of the United States and applicable statutory authorities.

SLMPD situational awareness cameras cannot be used for routine foot patrol by officers, traffic enforcement, or immobilizing a vehicle or suspect.



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The SLMPD does not seek court authorization before using situational awareness cameras. The Swat Team does not seek court authorization for use of the drone but obtains search warrants to apprehend wanted individuals. The deployment of situational cameras does occur during exigent circumstances, such as assessing potentially dangerous situations (i.e., barricaded situations, hazardous situation, or other compromised locations) from a safe location, or when attempting to locate at risk missing persons, such as juveniles or elderly persons with cognitive impairments, or attempting to locate fugitives who pose a threat to the overall safety of the community.

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?*
- c) SLMPD situational awareness cameras cannot be used for routine foot patrol by officers, traffic enforcement, or immobilizing a vehicle or suspect.

Authorized users will not use situational cameras 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, unless part of an emerging incident related to law enforcement activities.

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 allow any unauthorized persons to utilize the situational cameras.

- d) *How and under what circumstances will surveillance data that was collected, captured, recorded, or intercepted by the surveillance technology be analyzed and reviewed?*

No data is recorded by situation cameras for either the helicopter cameras or the drone cameras.

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.



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Situational awareness cameras are attached to equipment with aerial capabilities. They are deployed during incidents that require law enforcement to assess potentially dangerous situations (i.e., barricaded situations, hazardous situation, or other compromised locations) from a safe location.

The Aviation Unit camera is deployed during the operation of the helicopter and focuses on active investigations occurring in real-time.

The Swat Unit drone camera is deployed during the execution of a search warrant or during exigent circumstances where additional visual information can benefit the outcome of the situation, such as a barricaded situation.

Situational awareness cameras are not deployed based on geographic area.

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.

There are no costs associated with the situational awareness cameras. No continuing maintenance or operation costs have been budgeted or required.

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 Swat Unit drone camera is deployed during the execution of a search warrant or during exigent circumstances where additional visual information can benefit the outcome of the situation, such as a barricaded situation.

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DATA COLLECTION:

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

Data captured by situational cameras is only live footage. These devices do not record.

- 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?*

There is not inadvertent collection of data as these devices do not record.

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

There is not inadvertent collection of data as these devices do not record.

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

Data is not retained by SLMPD for situational awareness cameras, as these devices do not record.

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 situational awareness cameras. Only members of the SLMPD Aviation Unit has access to the helicopter camera. Only members of the Swat Team are authorized access to the drone cameras.

Authorized users will not allow any unauthorized persons to utilize the situational cameras. Any violation of this use plan or departmental policy will result in disciplinary actions.



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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.

Situational awareness cameras do not record and therefore no data is retained by the agency.

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 members of the SLMPD Aviation Unit and the SLMPD Swat Team have access to the helicopter camera and the drone cameras, respectively.

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

No sharing of the data is necessary.

- 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 authorized members assigned to the SLMPD Aviation Unit and the SLMPD Swat Team have access to the situational cameras assigned to those units. Situational cameras do not record therefore no data can be disclosed to unauthorized persons or entities.

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 is not retained for the technology, because it does not record.

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.

Members of the SLMPD Aviation Unit are trained on how to use the camera on the helicopter. Members of the Swat Team are trained on how to use the drone cameras. Both units are trained in the technical, legal and ethical parameters of appropriate use.



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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 Major of the Specialized Enforcement oversees the implementation of the situational awareness cameras and ensures all policies and procedures of usage are followed.

Anyone who engages in the unauthorized use or misuse of any departmental policies or procedures 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.