

APPENDIX A: SURVEILLANCE TECHNOLOGY IMPACT REPORT

Department or Division:	Somerville Fire Department
Compliance Officer (name and position):	Chief Charles Breen & Assistant Chief Sean Tierney
Submitted by:	Chief Charles Breen
Date:	6/24/2024
Surveillance Technology:	Homeland Security Cameras at Fire Stations

X	Please identify the purpose(s) of the proposed surveillance technology. Select ALL that apply by entering "X" in the left column.
	Identifying and preventing threats to persons and property and preventing injury to persons or significant damage to property
	Identifying, apprehending, and prosecuting criminal offenders
	Gathering evidence of violations of any law in criminal, civil, and administrative proceedings
X	Providing information to emergency personnel
	Documenting and improving performance of City employees
	Executing financial transactions between the City and any individual engaged in a financial transaction with the City
	Preventing waste, fraud, and abuse of City resources
X	Maintaining the safety and security of City employees, students, customers, and City-owned or controlled buildings and property
	Enforcing obligations to the City
	Operating vehicles for City business
	Analyzing and managing service delivery
	Communicating among City employees, with citizens, or with third parties
	Surveying and gathering feedback from constituents
	Other (Describe): If the surveillance technology is used for a purpose not listed above, does the purpose comply with the surveillance use policy? ___ Yes ___ No

Complete ALL of the following items related to the proposed surveillance technology. Be as specific as possible. If an item is not applicable, enter "N/A." Do NOT leave fields blank.

1. Information describing the surveillance technology and how it works:

This technology is a surveillance camera with the ability to create a live video feed and preserved recordings. The cameras will be used to monitor Fire Department critical infrastructure (fire stations). The Somerville Police Department (SPD) will have access to the video feed and preserved video. The Fire Alarm Office (Fire Dispatch) will be able to monitor the live video feed from the cameras to view activity outside of the fire stations. No agency outside of Somerville has access to these cameras. This technology is owned and operated by the Boston Office of Emergency Management (BOEM) via funds from the Federal Government.

a. Authorized use – the uses that are authorized, the rules and processes required before that use, and the uses that are prohibited (10.64.b.2):

The camera's primary use is to monitor the exterior of Fire Department property (fire stations). The cameras are running continuously and are accessible to those with a user account, which includes Detectives, Traffic, Station Officers, and Commanders. These cameras operate on the same server as the Homeland Security and GLX cameras and those with access to city cameras have access to these 9 Fire Station cameras as well. The SPD Sergeant assigned to Homeland Security will be the primary liaison for the company that maintains the cameras, Lantel, and the BOEM. The cameras can be accessed by the SPD in cases of public emergency, accident investigation or criminal investigation.

All video surveillance would fall under the section of the City's Surveillance Technology Use Policy entitled "Video Surveillance Technology, Data and Use by the Police Department", which articulates the rules, purposes, and policy of using video surveillance equipment.

b. Training – the training, if any, required for any individual authorized to use the surveillance technology or to access information collected by the surveillance technology, including whether there are training materials (10.64.b.9):

Lantel, the company that installs and maintains the cameras, offers on-site training in the use of the cameras. There are no training manuals, however Lantel will assist with technical needs and questions for Fire Department personnel monitoring the live video or SPD personnel with access to the feed and preserved video.

Any officer so required shall receive a copy of and training on the Surveillance Technology Ordinance and the Surveillance Technology Use Policy.

The section of the City's Surveillance Technology Use Policy entitled "Video Surveillance Technology, Data and Use by the Police Department" provides the following regarding training- "The Chief of Police, or their designee, shall ensure that all department personnel successfully complete training which the Chief of Police deems necessary to successfully operate and monitor Video Surveillance Equipment. Furthermore, it states "Superior Officers and Detectives shall receive training in the operation of the system, including but not limited to, logging on, angle manipulation (pan, tilt, zoom), and retrieving archive video." Patrol Officers would be trained in regard to the location of cameras and familiarization of the system.

2. Information on the proposed purpose(s) for the surveillance technology (10.64.b.1):

The primary purpose of these cameras is to provide security for Fire Department critical infrastructure (fire stations). It will also allow Fire Alarm Dispatchers to monitor the arrival and departure of fire apparatus, especially that of mutual aid apparatus (apparatus from neighboring cities and towns) providing support at fire stations during a multiple alarm fire.

3. Information describing the kind of surveillance the surveillance technology is going to conduct and what surveillance data is going to be gathered (10.64.b.3):

The primary function is to provide security for Fire Department critical infrastructure (fire stations) and immediate surrounding property, such as parking lots. The cameras may record some areas of public roads in the City of Somerville and this footage can be used in investigations into both crimes and serious motor vehicle crashes. The cameras will only capture visual footage, no sound is captured.

a. Data access – the individuals who can access or use the collected surveillance data, and the rules and processes required before access or use of the information (10.64.b.4):

Use of this technology falls under the section of the City’s Surveillance Technology Use Policy entitled “Video Surveillance Technology, Data and Use by the Police Department”.

Those with access capabilities can view live feeds from the camera in real time. The cameras run on a live loop and may be viewed by Fire department personnel as well as SPD personnel. Only SPD personnel will have access to preserved video.

If footage is needed for an investigation, it can be preserved. A preserved video would be assigned a case number and preserved with the knowledge and authorization of a detective supervisor. Requests for copies of recorded images from police departments or court personnel shall be made to the Administrative Captain or their designee. Currently the Homeland Security Sergeant is the Administrative Captain’s designee. Preservation of video and video retrieval will be the responsibility of the Homeland Security Sergeant as the Administrative Captain’s designee.

SPD provides surveillance technology data to other Law Enforcement Agencies and the District Attorney’s Office when commanded by subpoena, pursuant to a request under M.G.L. c. 66 (the Public Records Law), and under the terms of the pertinent Massachusetts Mutual Aid Agreement.

b. Data protection – the safeguards that protect information from unauthorized access, including, but not limited to, encryption, access-control, and access-oversight mechanisms; (10.64.b.5)

The section of the City’s Surveillance Technology Use Policy entitled “Video Surveillance Technology, Data and Use by the Police Department” is intended to establish general procedures for conducting video surveillance, establish internal control processes and procedures to ensure the protection of individual’s civil rights. All users need to log into department computers to view the camera application. The access is tracked via a user log, and this log would be available through a user audit. Video is only viewable by department members with login. The login record is preserved through the IT Department and can be viewed in the instance of suspected misuse.

Some members of the department are required to log into the system as a course of their regular duties. Station officers would need to view cameras to monitor arrestees while in custody of the SPD. The Traffic unit would have access to monitor live feeds of roadways in the city. Commanders

	would have access to monitor cameras within the SPD to ensure safety of the personnel in the building as well as people in custody of the SPD. Since all of the cameras operate on the same server there is no way currently to differentiate access to certain devices.
c.	Data retention – the time period, if any, for which information collected by the surveillance technology will be routinely retained, the reason that retention period is appropriate to further the purpose(s), the process by which the information is regularly deleted after that period has elapsed, and the conditions that must be met to retain information beyond that period (10.64.b.6):
	Video is kept on the server for approximately 30 days and then overwritten unless preserved for a longer period for the purpose of an investigation.
d.	Public access – if and how collected surveillance data can be accessed by members of the public, including criminal defendants (10.64.b.7):
	Public Information requests can be made and, based on approval from the City’s Law Department, can be granted. Footage may be subject to discovery in criminal cases and subpoenas in civil cases.
e.	Third-party data-sharing – if and how other city or non-city entities can access or use the surveillance data, including any required justification and legal standard necessary to do so, and any obligation(s) imposed on the recipient of the surveillance data (10.64.b.8):
	Footage can be shared with other law enforcement agencies when requested in regard to criminal or motor vehicle crash investigations or initiated by SPD as part of an SPD active investigation. Video is shared only for law enforcement purposes or for valid public information requests. Any outside agency would need to make a request for footage per department policy and the section of the City’s Surveillance Technology Use Policy entitled “Video Surveillance Technology, Data and Use by the Police Department”.
4.	The location(s) it may be deployed and when:
	Nine cameras will be installed to monitor the exterior of fire stations as well as any outside areas such as parking lots.
5.	A description of the privacy and anonymity rights affected and a mitigation plan describing how the department’s use of the equipment will be regulated to protect privacy, anonymity, and limit the risk of potential abuse:
	Cameras will be located on public roadways where there would be no expectation of privacy. They do not record sound. Location of the cameras are recorded, and cameras cannot be moved to record private property or residences. Anyone accessing and using a recording would be documented through IT. Although these cameras capture all items with their range of view, their use is designed to secure Fire Department critical infrastructure, not monitor citizen activities. The section of the City’s Surveillance Technology Use Policy entitled “Video Surveillance Technology, Data and Use by the Police Department” states “The Video Surveillance System shall be used to view only what is in the general public’s view. Monitoring anything that would be deemed an invasion of privacy would be prohibited.”
6.	The potential impact(s) on privacy in the city; the potential impact on the civil rights and liberties of any individuals, communities or groups, including, but not limited to, communities of color or other

marginalized communities in the city, and a description of whether there is a plan to address the impact(s):

Cameras will be installed to monitor Fire Department critical infrastructure (fire stations). Cameras are on city roads and directed at fire stations, they are not positioned on any other basis. Login procedures and recording authorization will track users and ensure all use and recordings are for approved criminal or traffic investigation. Any movement of fixed cameras is required to be reported to the BOEM and will only be moved for a legitimate law enforcement or emergency reason.

The Somerville Police have a Bias Based Policing Policy (#115). This policy emphasizes the Department's commitment to protecting the Constitutional and civil rights of its citizens. Any misuse of these cameras to police prejudicially would be a violation of department policy. Any movement of cameras for an investigative reason would have to be approved by a detective supervisor.

7. An estimate of the fiscal costs for the surveillance technology, including initial purchase, personnel and other ongoing costs, and any current or potential sources of funding:

UASI funds will pay for the acquisition of the cameras, the installation and ongoing maintenance. These cameras are on the same server as other city cameras so there would be no additional costs. The SPD Homeland Security Sergeant will liaise with Lantel and BOEM as part of their current job duties. The Homeland Security Sergeant and the Special Operations Lieutenant are in charge of managing and maintaining video operations in the SPD as part of their assigned duties. No significant increase in time is anticipated. No additional personnel is required from the Fire Department to monitor the video feed.

8. An explanation of how the surveillance use policy will apply to this surveillance technology and, if it is not applicable, a technology-specific surveillance use policy:

This technology visually records so the city policy would apply.

a. Oversight – the mechanisms to ensure that the surveillance use policy is followed, including, but not limited to, identifying personnel assigned to ensure compliance with the policy, internal record keeping of the use of the technology or access to information collected by the surveillance technology, technical measures to monitor for misuse, any independent person or entity with oversight authority, and the sanctions for violations of the policy (10.64.b.10):

The SPD Homeland Security Sergeant and Special Operations Lieutenant have been designated by the Chief of Police as supervisors. The SPD Homeland Security Sergeant would oversee use of these cameras. Other SPD personnel can view and download footage. This access is dependent on authorization from the individual's immediate supervisor. The system generates an access log, which can be preserved through the IT Department, that tracks username logins. This allows identification of when the data was accessed, and by whom. Violations of this use policy and camera misuse may lead to discipline up to termination, depending on the actions.

The section of the City's Surveillance Technology Use Policy entitled "Video Surveillance Technology, Data and Use by the Police Department" would establish internal control processes and procedures to ensure the protection of individual's rights and to ensure the efficiency and effectiveness of video surveillance operations.