

**APPENDIX A: SURVEILLANCE TECHNOLOGY IMPACT REPORT**

<b>Department or Division:</b>	Somerville Police Department (SPD)
<b>Compliance Officer (name and position):</b>	Lt. Jeff DiGregorio
<b>Submitted by:</b>	Lt. Jeff DiGregorio
<b>Date:</b>	
<b>Surveillance Technology:</b>	Homeland Security Cameras

<b>X</b>	<b>Please identify the purpose(s) of the proposed surveillance technology. Select ALL that apply by entering "X" in the left column.</b>
x	Identifying and preventing threats to persons and property and preventing injury to persons or significant damage to property
x	Identifying, apprehending, and prosecuting criminal offenders
x	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
	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): To monitor roadways in an event of an emergency  If the surveillance technology is used for a purpose not listed above, does the purpose comply with the surveillance use policy? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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:

There are about 30 working cameras affixed to traffic poles throughout the city. This technology is owned and operated by the City of Somerville. Cameras were made available through the Boston Office of Emergency Management via funds from the federal government. Four additional cameras were purchased by the city to monitor traffic as a result of the GLX project. These cameras all operate on the same server. The Homeland Security cameras are used to monitor evacuation routes around Boston and adjacent towns. Somerville police have access to the video feed and video can be preserved. No agency outside of the City of Somerville has access to these cameras.

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):

All video surveillance would fall under SPD General Order #423, which articulates the rules, purposes, and policy of using video surveillance equipment

These cameras can be accessed by the police department in cases of public emergency, to investigate a crime, or as part of an officer's assigned duties. Department members authorized to use cameras include Detectives, Traffic Officers, Station Officers, and Commanders.

The camera's primary use is to monitor traffic routes, however this technology has been used in a surveillance capacity in criminal cases and in traffic investigations. The Homeland Security Sergeant is the primary liaison for the company that maintains them, Lantel, and the Boston Office of Emergency Management. Cameras can be accessed in case of public emergency, accident investigation, or criminal investigation. The cameras can be accessed by police personnel to monitor roads as well as the camera system in police headquarters. Station officers and shift commanders would log into this system to view cameras in the cell block to insure the well being of those in custody. Currently the Homeland Security cameras and GLX cameras run on the same server as the cameras in police headquarters, so access would be granted to all of the cameras on that system.

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):

Use of this technology falls under the guidelines established in SPD policy #423 - Video Surveillance

SPD Policy #423 provides the following in regards to training- "The Chief of Police, or his/her 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, the policy 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 regards to the location of cameras and familiarization of the system. The cameras are accessible by logging into the application. Lantel, the company that installs and maintains the cameras, offers on site training in the use of these cameras.

Lantel, the company that installs and maintains the cameras, offers on site training in their use. There are no training manuals, however lantel will assist with technical needs and questions.

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

The main purpose of these cameras is to monitor major evacuation routes around the Boston metro area. This technology has been used in the course of criminal investigations and motor vehicle accidents as well. In-house cameras (SPD building cameras) and the 4 GLX cameras are on the same server, so access to Homeland Security cameras would also grant access to the cameras in police headquarters and to GLX cameras.

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 main function of these cameras is to monitor routes in the Boston area and surrounding towns in the case of an emergency requiring an evacuation. The cameras do however record public roads in the City of Somerville and this footage has been used in the investigations for both crimes and for serious motor vehicle accidents. Requests for footage would be made through the Administrative Captain or his/her designee, currently the Homeland Security Sergeant.

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 guidelines established in SPD General Order #423 - Video Surveillance.

The traffic department, detectives, patrol supervisors, station officers, IT, and crime analysis can access these cameras. The cameras run on a live loop throughout the city. Officers assigned to traffic and as station officers would use the cameras to monitor roadways in the city. Station officers and patrol commanders would monitor this system to view cell block footage while there is someone in the custody of the SPD. No agency outside of the SPD can access these cameras.

Preservation of video and video retrieval will be the responsibility of the Homeland Security Sergeant as the Administrative Captain's designee. Examples of circumstances where video preservation and retrieval would be necessary may include, evacuation route planning, traffic monitoring, investigative purposes, and motor vehicle crash reconstruction.

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 SPD has issued General Order #423 entitled 'Video Surveillance'. The purpose of this order is 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 access. 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):

Members of the public can make a Public Information Request through the Administrative Captain in writing. This request is then forwarded to the City of Somerville Law Department for final approval. If the video is preserved for a criminal investigation and becomes evidence and it is subject to discovery.

- 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):

Video could be shared with other city or law enforcement agencies depending on the type of investigation. i.e. State police investigating an accident on McGrath Highway.

Select members of the Somerville Police Department, Fire Department (Chief Breen, Deputy-Chief Majors, Fire Alarm) and the DPW Highway Superintendent can view the cameras on these servers. Any outside agency would make a request for footage per SPD Policy #423 - Video Surveillance (Section 9, subsection B).

4. The location(s) it may be deployed and when:

Approximately 30 working cameras are dispersed across the city on public roads and intersections at fixed conspicuous locations. Cameras can be moved if there is a stated safety need by the city or for legitimate law enforcement necessity. All movements of cameras would have to be reported to Boston EM. Current list and location is available upon request. Camera locations have been forwarded to Director Webber.

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 are in fixed positions and used for evacuation route planning, traffic monitoring, investigative purposes, motor vehicle crash reconstruction. Although these cameras capture all items with their range of view, their use is designed to capture traffic patterns, not citizen activities. SPD policy number #423 states " The Video

<p>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.”</p> <p>Cameras are located on public roadways where there would be no expectation of privacy. They do not record sound. Locations of cameras are recorded and cameras cannot be moved to record private property or residences. Anyone accessing and using a recording would notify the Homeland Security Sergeant or if applicable another supervisor depending on the investigation. Activity would be documented through IT as well as through case numbers for investigations.</p>
<p>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):</p>
<p>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. Cameras are installed in locations based on emergency evacuation route planning and not based on particular populations. These routes connect to those in Boston and other surrounding cities. Any movement of cameras for an investigative reason would have to be approved by the Homeland Security Sergeant and a detective supervisor. Any movement of fixed cameras would also need to be reported to the Boston EM office and cameras could only be moved for a legitimate law enforcement or emergency reason. Log in procedures , user logs, and SPD surveillance policy would help ensure against abuse.</p>
<p>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:</p>
<p>UASI funds paid for installation and maintenance of the cameras so there is no cost to the city. 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.</p>
<p>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:</p>
<p>Since this technology records visually, the city’s policy would apply.</p>
<p>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):</p>
<p>The Homeland Security Sergeant and Special Operations Lieutenant would oversee cameras and their placement. Department policy would serve as a guideline for use and retention of data from these cameras. Any misuse and violation of department policy could lead to discipline up to and including termination. The Homeland Security Sergeant and Special Operations Lieutenant have been designated by the Chief of Police, based on their familiarity with the platform and their positions as supervisors. Currently, The Somerville Police have a Video Surveillance Policy (#423) that 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.</p>

The system generates an access log, which can be preserved if necessary through the IT department, that tracks username log-ins. This would allow for monitoring and identification of who used the technology and when.