

**SURVEILLANCE TECHNOLOGY IMPACT REPORT**

<b>Department or Division:</b>	Parking Department
<b>Compliance Officer (name and position):</b>	Suzanne Rinfret, Director of Parking
<b>Submitted by:</b>	Suzanne Rinfret
<b>Date:</b>	Oct 6, 2023
<b>Surveillance Technology:</b>	Camera Ticket Enforcement

X	Please identify the purpose(s) of the proposed surveillance technology. Select ALL that apply by entering "X" in the left column.
<input type="checkbox"/>	Identifying and preventing threats to persons and property and preventing injury to persons or significant damage to property
<input type="checkbox"/>	Identifying, apprehending, and prosecuting criminal offenders
<input type="checkbox"/>	Gathering evidence of violations of any law in criminal, civil, and administrative proceedings
<input type="checkbox"/>	Providing information to emergency personnel
<input type="checkbox"/>	Documenting and improving performance of City employees
<input type="checkbox"/>	Executing financial transactions between the City and any individual engaged in a financial transaction with the City
<input type="checkbox"/>	Preventing waste, fraud, and abuse of City resources
<input type="checkbox"/>	Maintaining the safety and security of City employees, students, customers, and City-owned or controlled buildings and property
<input type="checkbox"/>	Enforcing obligations to the City
<input type="checkbox"/>	Operating vehicles for City business
<input type="checkbox"/>	Analyzing and managing service delivery
<input type="checkbox"/>	Communicating among City employees, with citizens, or with third parties
<input type="checkbox"/>	Surveying and gathering feedback from constituents
x	<p>Other (Describe): To enforce parking regulations in designated No Parking areas where parking is illegal and dangerous for the benefit and safety of residents and visitors.</p> <p>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</p>

**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:

The technology allows automated enforcement capabilities to protect no-parking areas e.g. bus stops fire hydrants, crosswalks, and loading zones. It utilizes electronic license plate recognition in order to enforce parking regulations. It is a solar energy solution and can operate for up to 81 days without sunlight. The Solar Stick takes a picture of the plate of the vehicle that is illegally parked. The camera logs the time the vehicle entered and exited the illegal parking space. There is a "grace period" of three minutes once a vehicle has entered a No-Parking Zone. That information is sent to the city for verification. A ticket is mailed to the violator after approval from the City's Parking Department.

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 device will be used for issuing parking violations only. All data belongs to the city. Data regarding the violators is retained by the vendor until the violation is paid or appealed. The vendor will not share data with any third party without the written consent of the city. Parking control officers are authorized to review data and images received from the vendor. Once a violation is reviewed for accuracy, it is mailed to the offender. The violation will follow the same rules as an officer issuing the ticket.

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):

The vendor will provide live and virtual training sessions if needed regarding the application of the technology, parking reports, and verification of the evidence.

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

The technology will be used to enforce parking rules designed to prevent illegal and dangerous parking in areas such as bus stops, hydrants, bike lanes, and crosswalks areas where preventable injuries and deaths occur.

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 technology will take a picture of the vehicle and plate in violation. The data gathered by the technology includes, address of the violation, duration, type of violation etc.

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):

When a vehicle enters an illegal spot, the technology takes a picture of the plate of the vehicle that is illegally parked for more than 3 minutes and logs the time the vehicle entered and exited the illegal parking space. This information collected by Solar Stick is sent to the City's Parking Department in the form of daily reports. The Parking Department reviews the violation for authenticity and notifies Safety Stick if the violations are approved or denied. If the violation is approved, Safety Stick collects registered owner information for the violator and mails notice to registered owner.

As per our standard protocol for all parking tickets, Traffic and Parking employees and 311 can access the information. The vendor will have access to the data collected until the violation has completed its normal collection, payment, appeal or dismissal cycle.

- 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)

It is only accessible by the relevant City Departments and the vendor (Solar Stick). The vendor is required to take reasonable steps to maintain the security of all parking data it possesses, including (without limitation) by making reasonable efforts to authenticate the authorized parties using a username and individual password; maintain confidentiality of such username and password; physically secure equipment and facilities in its control; appropriately supervise its personnel; periodically evaluate its security safeguards; install and maintain appropriate firewalls and other technical measures; and guard against intentional or unintentional corruption or loss of the parking data in its control.

- 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):

The violation images are retained by the vendor until violations are paid, appealed, or adjudicated. At that point, they will be deleted from their records. The City's policy is to retain information regarding the tickets in our system for up to 20 years.

- d. Public access – if and how collected surveillance data can be accessed by members of the public, including criminal defendants (10.64.b.7):

Data will be shared by the City on a case-by-case basis in response to a public records request in compliance with the law. Further, a vehicle owner may request information regarding their vehicle upon showing their proof of identity.

- 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):

All ticket violations, if requested by law enforcement, are shared by the Parking department after the request has been authenticated. The Parking Department will coordinate with the Somerville Police Department if the request is submitted by an external law enforcement agency. Outside agencies do not have direct access to the ticket processing system. The vendor is prohibited from sharing confidential data with any third party without the written consent of the City, or unless legally compelled to do so.

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

The Safety Sticks with cameras will be deployed in areas that we have determined to be most necessary. Currently, the following locations have been identified to deploy this technology:

240 Elm St, Somerville

246 Elm St, Somerville

Signs will be posted at locations where this technology will be deployed to warn motorists about the automated enforcement of parking violations.

Safety Sticks will begin processing violations once the impact report has been approved and the agreement between the city and vendor is finalized.

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:

See response to 3 (b).

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):

None.

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:

A transaction fee is charged for each violation processed similar to the credit card processing fee paid when someone pays an excise tax bill. Therefore, the city has no fixed or upfront costs or liabilities.

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:

The Parking Department will comply with the requirements of the surveillance use policy.

- 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):

Safety Stick tickets will be issued, paid, or appealed in the exact same way tickets are issued currently. The only exception is that a ticket and photo of the license plate will be mailed to the registered owner. All tickets are stored within a secure ticket processing system. Traffic Commission rules and regulations regarding the appeal process provides due process to the violator and oversight over any potential misuse.

