

SURVEILLANCE TECHNOLOGY IMPACT REPORT

Department or Division:	Parking Department
Compliance Officer (name and position):	Suzanne Rinfret, Director of Parking
Submitted by:	Suzanne Rinfret
Date:	February 7, 2023
Surveillance Technology:	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	Other (Describe): To enforce parking regulations for the safety of all. 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:

The technology allows automated enforcement capabilities to protect no-parking areas, 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 the illegal parking and the time it leaves the space. That information is sent to the city for verification then processed through the ticket processing system. At that time the ticket is mailed to the violator.

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. The vendor will not share data with the parking department for any other use. The parking control officer is 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 training 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 such as blocking bus stops, hydrants, bike lanes, and crosswalks.

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 meter number, address of the violation, duration, 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):

As per our standard protocol for all parking tickets, Traffic and Parking employees and 311 can access the information.

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 information will go directly to the Parking Office to be submitted to the ticket processing vendor. The vendor will ensure that all data collected is protected by passwords, VPN and encryption. It is only accessible by the City and the vendor.

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 delete 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 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. Outside agencies do not have direct access to the ticket processing system. The information is stored in our ticket processing database like any ticket written, employees of the parking department can query plates and names as needed.

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

The 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

<p>246 Elm St, Somerville</p>
<p>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:</p>
<p>See response to 3 (b).</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>None.</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>This is based on the number of tickets issued and paid.</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>As adopted in 2017, the Surveillance Technology Use Policy excludes technology such as the solar stick. However, the Parking Department has complied with the policy by providing the information sought in this impact report and the presentation by Director Rinfret to the Legislative Matters Committee on January 17, 2023.</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 tickets issued and information relating to the tickets will be stored in the same way tickets written in the field will be stored. All tickets are stored within the ticket processing system. Traffic Commission rules and regulations regarding the appeal process provides due process to the violator and oversight over any potential misuse.</p>