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PUBLIC SAFETY
CAMERA REVIEW COMMITTEE

POLICIES AND PROCEDURES
FOR
CITY OF STAMFORD USE AND APPROVAL OF PUBLIC SURVEILLANCE CAMERAS

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FORWARD

This policy and procedures manual, as adopted by the Stamford Board of Representatives, specifies the rules governing the use and approval of Public Surveillance Cameras in the City of Stamford. This policy manual enumerates the authority and responsibilities of the Public Safety Camera Review Committee ("CRC") and addresses the privacy rights of those individuals subject to electronic surveillance.

Nothing in this manual shall be deemed to authorize the use of Public Surveillance Cameras beyond that contemplated by Section 7-2 of the Code of Ordinances of the City of Stamford, as such section may be amended from time to time. This manual shall not apply to the installation of any Public Surveillance Camera in the City of Stamford pursuant to a valid order of a court of competent jurisdiction or a valid subpoena.

DEFINITIONS

"**Aberration Software**" shall mean any software used in conjunction with Public Surveillance Camera that detects unexpected movement or unusual behavior or other aberrations in an Authorized Surveillance Zone that may pose a threat to people, property or infrastructure, either in Real Time or retrospectively, without the requirement of human monitoring.

"**Automatic Identification**" shall mean the use of the Public Surveillance Cameras, either disclosed or non-disclosed, in conjunction with software or other digital technologies, to ascertain or confirm the identity or location of an individual whose image is captured on the video surveillance Footage or automatically identifying specific perils such as fires, whether in Real Time, retrospectively, or prospectively, without the requirement of human monitoring.

"**Authorized Surveillance Zones**" shall mean Public Places and private locations, including private thoroughfares, located in and around the City of Stamford in which the CRC has authorized the use of Public Surveillance Cameras.

"**Camera Surveillance**" shall mean the use of Public Surveillance Cameras to conduct surveillance on any activity in Public Places and private locations, including private thoroughfares, or other property as necessary to meet the objectives of Section 7-2.C of the Code of Ordinances of the City of Stamford.

"**Camera Surveillance System**" shall mean the Public Surveillance Cameras and any devices used for the capturing, monitoring, transmission and/or recording of Feeds or Footage from the Public Surveillance Cameras.

"**Confidential Information**" shall mean matters subject to Legal Privilege, confidential personal information relating to spiritual persuasion, sexual orientation, medical or mental health or confidential journalistic material or any other matter as to which a person has a reasonable expectation of privacy.

"**CRC**" shall mean the Public Safety Camera Review Committee as authorized by Section 7-2 of the Code of Ordinances of the City of Stamford.

"**Facial Recognition**" shall mean the use of the Public Surveillance Cameras, either disclosed or non-disclosed, in conjunction with software or other digital technologies, to ascertain or confirm the identity or location of an individual whose image is captured on the video surveillance Footage, whether in Real Time, retrospectively, or prospectively, without the requirement of human monitoring, by automatically identifying the facial features of an individual person.

"**Feed**" shall mean the visual information transmitted by a Public Surveillance Camera.

"**Footage**" shall mean any Material recorded by a Public Surveillance Camera including time and location data and any additional metadata or information appended to the Material.

"**Legal Privilege**" shall mean communications and/or documents between an attorney and his or her client for the purpose of rendering professional advice relating to pending or possible litigation. Legal Privilege does not apply to communications made with the intention of furthering a criminal purpose.

"**Material**" shall mean any electronically or digitally Recorded data, image, sound or other information.

"**Non-Disclosed Public Surveillance Camera**" shall mean a camera that does not have any public signage or other notification to the public that the area is under Camera Surveillance. Typically this is to maintain the secrecy of the existence of the camera.

"**Operator**' shall mean a person or persons under the direction of any City of Stamford Department authorized to operate, use or monitor the Camera Surveillance System.

"**Privacy Zones**" shall mean technology used to prevent users from viewing sensitive or secured areas by blocking out the area that has been defined as sensitive, such as windows of private property.

"**Public Feed**" shall mean any Feed that is available for viewing by members of the public on a Real Time basis.

"**Public Places**" shall mean public streets, public walkways, public rights of way, public parks, and any other public gathering areas. However, Public Places shall not include the interior of buildings or the interior of parking garages owned or operated by the City of Stamford or any other governmental agency, or the immediate entrances and exits to buildings or parking garages owned or operated by the City of Stamford or any other governmental agency.

"**Public Surveillance Camera**" shall mean any and all devices that are affixed to structures, whether owned or operated by the City of Stamford or any agency, department or subset thereof, or private structures, that are used for the transmission or recording of visual activity in Public Places or in private locations, including private thoroughfares, or other property as necessary to meet the objectives of Section 7-2.C, including without limitation any closed circuit video cameras or other cameras, video recorders, digital cameras, digital recorders or other technological devices used in the above manner.

"**Real Time**" shall mean live, instantaneous transmission or a transmission with a short (typically less than 15 minutes) delay.

"**Recorded**" shall mean preservation and storage of Feeds or Footage for any length of time beyond a short window necessary to perform an initial review of the Footage.

"**Serious Traffic Incident**" shall mean any accident or incident occurring on a highway, interstate, public roadway or private thoroughfare located within the City of Stamford involving two or more vehicles or, alternatively, a single vehicle and one or more pedestrians or cyclists including motorcycles, or any accident or incident requiring emergency ambulance or fire department response.

"**Super-Majority Vote**" shall mean a vote of four (4) of the five (5) CRC members.

"**Tracking**" shall mean the use of Public Surveillance Cameras or the Camera Surveillance System to follow an individual or group of individuals and/or his or her vehicle or vehicles, regardless of whether that individual's identity is known, so as to create a seamless or nearly seamless record of activity during a specific period.

"**Traffic Monitoring**" shall mean the viewing and management of vehicular traffic through the adjustment of traffic signals, whether performed manually or by computer, to facilitate the free flow of automobiles on the streets of the City of Stamford. In no event shall Traffic Monitoring be interpreted to include enforcement of minor, routine traffic violations.

"**Unmonitored Surveillance**" shall mean surveillance that is not routinely monitored or viewed in Real Time.

"**Window Blanking**" shall mean technology used to prevent users from viewing sensitive or secured areas by blocking out the area that has been defined as sensitive, such as windows of private property.

1 PURPOSE

1.1 The purpose of this document is to establish the policies and procedures by which the CRC may authorize and regulate the installation and use of Public Surveillance Cameras in the City of Stamford and the parameters by which Public Surveillance Cameras may be used in the City of Stamford.

2 SCOPE

2.1 The policies and procedures set out in this policy manual apply to the Stamford Police Department, all governmental entities of the City of Stamford, and any other governmental agency or official desiring to install and/or use Public Surveillance Cameras in the City of Stamford. Notwithstanding the foregoing, the policies and procedures in this manual do not apply to the interior of buildings or parking garages owned or operated by the City of Stamford or any other governmental agency, entrances and exits of buildings owned or operated by the City of Stamford or any other governmental agency or motor vehicles.

2.1.1 Nothing herein shall be construed to limit the ability of the Stamford Police Department to apply for search warrants or to use surveillance cameras to effectuate search warrants.

3 CAMERA REVIEW COMMITTEE

3.1 Pursuant to Section 7-2 of the Code of Ordinances for the City of Stamford, the CRC shall be composed of the Mayor or his or her designee; the Director of Public Safety, Health & Welfare or his or her designee; the President of the Board of Representatives or his or her designee; and two members of the public who shall be appointed by the Mayor and approved by the Board of Representatives.

3.2 No compensation, payment, gifts or other remuneration shall be paid or payable to any member of the CRC in return for service on said Committee.

4 ROLES AND DUTIES OF THE CAMERA REVIEW COMMITTEE

4.1 The key roles and duties of the CRC are to:

4.1.1 authorize the use of Public Surveillance Cameras other than those authorized by court order;

4.1.2 review the use of Public Surveillance Cameras in and around the City of Stamford by the Stamford Police Department and other governmental agencies and/or entities;

4.1.3 undertake in-depth periodic review of the policies of the City of Stamford regarding the use of Public Surveillance Cameras and make recommendations to the Stamford Police Department, all governmental entities of the City of Stamford, and any other governmental agency or official of the City of Stamford for improvements and revisions of such policies or as to any aspect of the Camera Surveillance System, including the location of any Public Surveillance Camera;

4.1.4 protect the City of Stamford's residents from unwarranted intrusions into their privacy as a result of the use of Public Surveillance Cameras; and

4.1.5 hold to account those persons responsible for making decisions in respect of the positioning and/or use of Public Surveillance Cameras.

5 LEGITIMATE USES OF THE CAMERA SURVEILLANCE SYSTEM

5.1 It is the intent of the CRC to restrict the uses of the Camera Surveillance System to legitimate uses as set out below and as set forth in Section 7-2 of the Code of Ordinances of the City of Stamford.

5.2 Nothing in this manual shall be deemed to authorize the use of Public Surveillance Cameras in any manner inconsistent with or not contemplated by Section 7-2 of the Code of Ordinances of the City of Stamford, as such section may be amended from time to time.

5.2.1 Notwithstanding the foregoing, to the extent there is any conflict between this manual and Section 7-2 of the Code of Ordinances of the City of Stamford, whichever contains greater restrictions upon the use of Public Surveillance Cameras shall apply.

5.3 The Camera Surveillance System may only be used, subject to the authorization of the CRC, for the following uses and purposes:

5.3.1 general crime prevention, deterrence, detection and investigation;

5.3.2 surveillance in the service of homeland security and the detection of terrorism threats;

5.3.3 surveillance for the purposes of public safety and disaster preparedness at locations identified as critical assets by the Department of Emergency Management and Homeland Security;

5.3.4 surveillance of City property;

5.3.5 identification of traffic problems or Serious Traffic Incidents;

5.3.6 providing information for Traffic Monitoring;

5.3.7 providing information for crowd control;

5.3.8 providing information for public safety, including, but not limited to, fires, rescues, water emergencies or locations of victims;

5.3.9 providing information for effective police management and deployment;

5.3.10 providing evidence for criminal and, where necessary, civil proceedings; and

5.3.11 any lawful purpose as approved by the CRC.

5.4 The Camera Surveillance System shall **not** be used for any of the following purposes:

5.4.1 prolonged or sustained scrutiny of individuals conducting lawful activities in a public setting or situation, including any activities involving the right to free speech;

5.4.2 surveillance and/or Tracking of individuals based on race, gender, ethnicity, religion, sexual orientation, disability or other classification protected by law;

5.4.3 viewing of areas outside of any Approved Surveillance Zone;

5.4.4 viewing the interior of any private residential property, including mobile homes;

5.4.5 detailed or systematic inspection of the interior of any private property located in a public space including, but not limited to bags and vehicles without probable cause; or

5.4.6 viewing of areas where an individual would reasonably expect not to be subject to camera surveillance without probable case, even though located in a public place, such as in vehicles, boats or toilets.

5.5 Demonstrations or rallies of any kind may be actively monitored only for reasonably foreseeable potential criminal activities or crowd management purposes.

5.6 Tracking shall be permitted in cases where there is probable cause to believe that a crime or other serious incident is about to occur or there is probable cause to believe that the individual may be or may have been involved in recent criminal activity.

5.7 The CRC may require the Stamford Police Department or any other governmental agency or official of the City of Stamford, Operators, or any other person, to justify their interests in, or recording of, any particular individual, group of individuals, or property at any time and for any reason. At the request of the Stamford Police Department or any other governmental agency, official of the City of Stamford, or other person seeking to use the Camera Surveillance System, any such discussions may be held in executive session by majority vote of the CRC, pursuant to C.G.S. 1-200(6)(c), which permits the use of executive sessions to discuss matters concerning security strategy or deployment of security personnel.

6 SURVEILLANCE LEVELS

6.1 There are four (4) surveillance levels for Public Surveillance Cameras, with the surveillance level depending upon whether the camera is visible to the public, has Monitored Surveillance and/or has a Public Feed, as listed below:

6.1.1 **Surveillance Level 1**: disclosed Public Surveillance Cameras with a Public Feed;

6.1.2 **Surveillance Level 2**: disclosed Public Surveillance Cameras without a Public Feed and without Monitored Surveillance (or with pre-authorized Monitored Surveillance less than 8 hours per week);

6.1.3 **Surveillance Level 3**: disclosed Public Surveillance Cameras with or without a Public Feed, but with Monitored Surveillance;

6.1.4 **Surveillance Level 4**: non-disclosed Public Surveillance Cameras without a Public Feed, either with or without Monitored Surveillance;

6.2 Upon the receipt of a completed written application and the subsequent meeting of the CRC, the CRC shall vote to approve or deny any application for the installation and use of a Public Surveillance Camera. The CRC shall also have the authority to approve a Public Surveillance Camera at a surveillance level different than that requested in the application.

6.3 The CRC is expected to apply an increasingly strict standard of approval to, and greater scrutiny of the appropriateness and effectiveness of, both newly requested and previously approved Public Surveillance Cameras as the

requested surveillance level increases from 1 to 4. Further, unless a compelling case can be made that surveillance levels 3 and 4 are required for a specific purpose, it is the public policy objective to minimize monitoring and/or review of surveillance cameras or surveillance Feeds, Footage or Material by any governmental authority and/or any private party unless such Feeds, Footage or Material is also made broadly available to the public.

6.4 The vote required to approve any Public Surveillance Camera placement will depend on the surveillance level of the camera as set forth in the following table:

Surveillance Level	**Approval Vote**
1	Automatic approval upon presentation of a valid application to the CRC, but can be denied by majority vote
2	Simple majority
3	3 affirmative votes, except automatic approval for Traffic Monitoring cameras
4	4 affirmative votes

6.5 An application for a Public Surveillance Camera with a surveillance level of 1 (disclosed and with a Public Feed) shall be automatically approved and authorized at the next subsequent CRC meeting except as provided herein, unless a majority of the CRC votes to deny the application.

6.5.1 Notwithstanding the foregoing, no application for a Public Surveillance Camera with a surveillance level of 1 shall be automatically approved if the CRC has previously rescinded approval for a Public Surveillance Camera in that location under Section 16.1 herein, unless the CRC has subsequently approved the use of a Public Surveillance Camera in that location.

6.6 No application for a Public Surveillance Camera with a Public Feed (surveillance level 1 or 3) shall be authorized for any location where the Authorized Surveillance Zone would include a public or private preschool, daycare center, nursery school, elementary, middle, or high school, any type of location listed in Section 10.2, or any location where a Public Feed might create a safety concern or a security risk to people, property or infrastructure.

6.6.1 Any two members of the CRC may deny the use of a Public Feed for locations meeting the criteria set forth in Section 6.6, but the CRC may approve the application for a Level 3 Public Surveillance Camera without a Public Feed.

6.7 If there is any disagreement about the surveillance level of a particular camera, the highest surveillance level that is approved by at least two (2) members of the Committee shall be the surveillance level for that camera.

7 TRAFFIC MONITORING CAMERAS

7.1 All Public Surveillance Cameras used for the purpose of Traffic Monitoring shall have a surveillance level of 3 (disclosed and with or without a Public Feed, but with Monitored Surveillance), and shall have a Public Feed whenever possible.

7.2 An application for a Public Surveillance Camera for the purpose of Traffic Monitoring shall be automatically approved and authorized at the next subsequent CRC meeting except as provided herein, unless a majority of the CRC votes to deny the application.

7.2.1 Any two members of the CRC may deny the use of a Public Feed for locations meeting the criteria set forth in Section 6.6, but the CRC may approve the application for a Level 3 Public Surveillance Camera without a Public Feed.

7.3 The public shall receive notice and an opportunity to be heard on any application for authorization of a Public Surveillance Camera used for Traffic Monitoring as set forth in Section 11.

7.4 All other provisions of this policy manual, including the provisions relating to emergency and urgent situations in Section 13 and Renewals of Authorizations in Section 15 shall apply to Public Surveillance Cameras for Traffic Monitoring, except that an application for renewal of a Public Surveillance Camera used for Traffic Monitoring shall be automatically approved.

7.5 Notwithstanding the foregoing, prior to July 1, 2011, the policies and procedures of this manual shall not apply to any Public Surveillance Camera used only for the purpose of Traffic Monitoring and installed prior to July 1, 2009.

8 LEGAL AUTHORIZATION

8.1 A written authorization from the CRC will provide legal authority under Section 7-2 of the Code of Ordinances of the City of Stamford for the Stamford Police Department and/or any other governmental agency to carry out Camera Surveillance in the City of Stamford.

8.2 Any Camera Surveillance carried out without prior written authorization from the CRC, except for temporary or emergency surveillance as permitted herein in Section 13, shall be considered to be without legal authorization.

9 APPLICATION FOR AUTHORIZATION

9.1 A written application for authorization must be submitted to the CRC prior to the installation of any type of Public Surveillance Camera, except as otherwise set forth in Section 13 of this manual.

9.2 The written application shall include:

9.2.1 the proposed location of the Public Surveillance Camera(s) and the positioning of other nearby cameras;

9.2.2 the proposed length of time the Public Surveillance Camera(s) is to be positioned at a location;

9.2.3 the nature of the surveillance requested, including the level of surveillance and whether there should be a Public Feed;

9.2.4 the specific purpose of the proposed surveillance (for example, preventing or detecting crime, Traffic Monitoring, or seeking particular information);

9.2.5 any potential risk of intrusion into the private lives of persons not connected to the specific purpose of the proposed surveillance and any actions taken to mitigate such risk;

9.2.6 any risk that Confidential Information is likely to be revealed as a consequence of the surveillance and any actions taken to mitigate such risk;

9.2.7 details of any sensitive or secured areas likely to be viewed by the Public Surveillance Camera(s) (for example, windows of private property such as homes or offices) that would need to be excluded or blocked from view, and any Privacy Zones, Window Blanking or other methods to be used to prevent the viewing of such areas;

9.2.8 whether a prior application for surveillance has been made relating to the particular investigation or operation and details of whether authority was previously granted or refused, when and by whom; and

9.2.9 details of any known sensitivity to the use of Public Surveillance Cameras in the local community where the surveillance is to take place.

9.3 An application seeking authorization for an unmonitored Public Surveillance Camera (Level 2) may anticipate that there will be limited but specific instances in which the camera will be monitored (e.g. monitoring of a specific planned event in the Authorized Surveillance Zone), and the application shall disclose such anticipated monitoring. The Level 2 designation shall still apply to such Public Surveillance Camera provided that anticipated monitoring shall be less than 8 hours of recorded time per week and the CRC does not require a higher level of approval as provided herein.

9.4 The Director of Public Safety, Health & Welfare, or his or her designee, shall maintain copies of all documentation relating to each authorization.

10 AUTHORIZATIONS INVOLVING CONFIDENTIAL INFORMATION / FREEDOM OF EXPRESSION AND ASSOCIATION

10.1 The CRC shall apply a heightened level of scrutiny to the use, installation or monitoring of Public Surveillance Cameras where the possibility exists that Confidential Information will be revealed.

10.1.1 Any application for the installation, use or monitoring of a Public Surveillance Camera which is likely to result in the acquisition of Confidential Information shall be made only in exceptional cases, upon the demonstration of compelling circumstances.

10.2 The CRC shall apply a heightened level of scrutiny to the use, installation or monitoring of Public Surveillance Cameras where the Authorized Surveillance Zone would include the locations listed below or locations where individuals would have similar privacy interests, unless the owner or operator the facility at such location gives prior, written consent to the use, installation or monitoring of such Public Surveillance Camera(s):

10.2.1 an emergency or non-emergency medical facility;

10.2.2 any social services facility (for example, a welfare office or Social Security Office);

10.2.3 a place of worship (for example, a church or religious-based organization).

11 PUBLIC NOTICE AND COMMENT ON PROPOSED AUTHORIZATIONS

11.1 The public shall receive notice and an opportunity to be heard on any application for authorization of a Level 1, 2 or 3 Public Surveillance Camera, including Public Surveillance Cameras for Traffic Monitoring.

11.1.1 Notice of any application for authorization of a Level 1, 2 or 3 Public Surveillance Camera shall be placed on the City of Stamford website and in a newspaper of local distribution, and, whenever practical, by signs placed at the site of the proposed Public Surveillance Camera within the proposed Authorized Surveillance Zone, at least ten (10) days prior to CRC consideration of such application, stating the location of the proposed Public Surveillance Camera, the time and place of the CRC meeting at which the application for the authorization is to be considered by the CRC and a telephone number for questions or concerns.

11.1.2 Members of the public shall be permitted an opportunity to appear before the CRC on any application for authorization of a Level 1, 2 or 3 Public Surveillance Camera and to comment on the appropriateness of any such camera.

11.2 The public shall not receive notice or an opportunity to be heard on any application for authorization of a Level 4 Public Surveillance Camera.

11.3 Notwithstanding the foregoing, in an urgent or emergency situation, the CRC, may, by Super-Majority vote, suspend the above public notice and comment procedures.

12 INCREASE OF SURVEILLANCE LEVEL OF CAMERA

12.1 An increase in surveillance level of any Public Surveillance Camera may be requested and shall require a new approval action by the CRC. The CRC's failure to approve a higher surveillance level shall not negate a prior approval of a lower surveillance level; however, the Public Surveillance Camera can only be used in the context in which it was previously approved.

12.1.1 Notwithstanding the foregoing, in the event of emergency or urgent situation requiring immediate monitoring, the procedures set forth in Section 13 shall apply.

12.2 Any two members of the CRC may approve a provisional increase in surveillance level of any Public Surveillance Camera at any time. After 30 days, the specific camera can no longer be used at any higher surveillance level unless and until the specific camera is approved at the higher surveillance level by the appropriate vote of the CRC, as required in Section 6.4 herein.

12.2.1 Notwithstanding the foregoing, in the event that the CRC is unable to meet within the 30 day period to approve an increase of the surveillance level of any Public Surveillance Camera, the provisional surveillance level used until the CRC next meets unless two or more CRC members object to the provisional level.

12.3 Any monitoring of cameras not authorized for such monitoring, no matter how casual or brief, or any provisional increase in surveillance level of any Public Surveillance Camera shall be reported to the CRC at the next CRC meeting. Any unauthorized monitoring shall be taken into account by the CRC in determining if a change of a camera surveillance level may be required as provided herein.

12.3.1 Any camera that is designated as unmonitored (surveillance levels 1 or 2), but is actively monitored for any reason, other than a purpose disclosed in the application for the Public Surveillance Camera, for more than three consecutive hours, or on five occasions in any 30-day period, shall automatically be reclassified as monitored and appropriately redesignated, and shall then be subject to the approval process as set forth above in order to retain the higher surveillance level. Any occasional or intermittent monitoring of the Feed of any camera, no matter how brief, shall be rounded to a minimum of 10 minutes, or, if within 10 minutes of any other monitoring, shall be considered continuous monitoring for purposes of determining how long the camera was monitored.

12.3.2 The CRC shall be informed as to the reason the camera was monitored and why a higher camera surveillance level is appropriate.

13 EMERGENCY AND URGENT SITUATIONS

13.1 The Chief of Police or other government official may, in urgent or emergency situations as described in Section 13.2, temporarily authorize monitored surveillance of Public Surveillance Cameras currently approved as non-monitored (surveillance level 1 or 2) or, if policy and procedures have been approved as provided in Section 18, the use of Facial recognition or other Automatic Identification technology or Aberration Software, without prior authorization from the CRC, only if he or she determines all of the following:

13.1.1 there is probable cause to believe that an emergency or urgent situation exists; and

13.1.2 there is probable cause to believe that a substantial danger to life, limb or property exists justifying the authorization for immediate Camera Surveillance or automatic identification technology before an application for authorization could, with due diligence, be submitted and acted upon.

13.2 **Emergency and urgent situations** include, but are not limited to natural disasters, threats to national security, threats to state or local infrastructure, large scale disasters, terror alerts, immediate threats to life and property, requests for assistance from on-the-scene police officers or other emergency workers; 911 calls of emergency situations; amber alerts; and threats to local security and stability such as acts of riot, insurrection and civil disorder, and threats to evidence of any of the aforementioned.

13.2.1 A situation shall not be regarded as an emergency or urgent unless the time that will elapse before the CRC is available to grant the authorization for a monitored surveillance level, will, in the judgment of the Chief of Police and/or government official or their designees, be likely to endanger life, limb or property, or jeopardize the investigation or operation for which the authorization is being given.

13.3 In any case in which surveillance is authorized as provided in this Section 13, the information required under Section 9 above shall be recorded in writing as soon as reasonably practicable, but in no event later than 2 weeks after the emergency or urgent situation, and submitted to the CRC within 30 days of the date of such authorization.

13.3.1 In addition to the information set out at Section 9 above, the record shall include the following:

13.3.1.1 the name and rank of the person who issued the emergency or urgent authorization;

13.3.1.2 all reasons why the person considered the case so urgent that a temporary authorization of monitoring was necessary.

13.4 The CRC shall be notified at each meeting of any and all temporary authorizations of monitored surveillance or enhanced surveillance as permitted under this Section.

13.5 Once the incident requiring immediate monitoring has ended, monitoring shall be discontinued and the camera operated in accordance with the surveillance level for which it is approved. However, the surveillance level of the camera may be provisionally increased as provided in Section 12.

13.6 In any case in which surveillance authorized as provided in this Section 13 continues, the continued use of such monitoring may be immediately terminated by a vote of 3 members of the CRC.

14 AUTHORIZATION FOR LINKS TO PRIVATE OR NON-GOVERNMENTAL CAMERAS OR MONITORING SYSTEMS

14.1 Electronic links to external cameras operated by public agencies or private entities that conduct surveillance of Public Places shall be subject to all of the same requirements as would a Public Surveillance Camera operated by the City of Stamford under these regulations, including approval by the CRC.

14.2 Applications for a link to an external monitored network shall be made in writing to the CRC and include the same information required for a City of Stamford Public Surveillance Camera of the same surveillance level and must also include the following:

14.2.1 name and location of the external camera or network;

14.2.2 name and address of the owners or operators of the external network;

14.2.3 details of the nature of the surveillance and the area surveyed by the private network;

14.2.4 details of the location and monitoring of the external network cameras;

14.2.5 copies of the documents granting permission by the owners or operators of the external network to the City of Stamford for the link to and use of said network;

14.2.6 any limitations or restrictions placed upon the use of the external network or cameras by the owners or operators of said network or cameras.

14.3 Notwithstanding the foregoing, nothing in this manual shall be deemed to prevent access by the Police Department to Material from surveillance cameras owned or operated by private entities, which Material is provided to the Police Department by such private entity for law enforcement purposes.

15 RENEWALS OF AUTHORIZATIONS

15.1 Authorization renewals shall be required every two years, or earlier if the authorization specified a shorter time limit. Authorizations may be renewed more than once, provided they continue to meet the criteria for authorization.

15.2 All applications for renewal of an authorization should set out:

15.2.1 whether this is the first renewal application, or, if not, every occasion on which the authorization has been renewed previously;

15.2.2 any significant changes to the information contained in the prior application;

15.2.3 the reasons why it is appropriate to continue the surveillance;

15.2.4 the content and value of the information so far obtained by the surveillance;

15.3 The CRC is expected to apply an increasingly strict standard of approval to, and greater scrutiny of the appropriateness and effectiveness of, previously approved cameras as the camera surveillance level increases from 1 to 4.

15.3.1 The vote required to approve the renewal of any Public Surveillance Camera placement will depend on the surveillance level of the camera as set forth in the following table:

Surveillance Level	**Approval Vote for Renewal**
1	Automatic, no vote required
2	Simple majority
3	3 affirmative votes
4	4 affirmative votes

15.3.2 Any renewal application for any Public Surveillance Camera used exclusively for Traffic Monitoring shall be automatically approved, with no vote of the CRC required.

15.4 A renewal takes effect at the time at which it is approved, except for renewals as set forth in Section 15.3.2.

15.5 Operation of a Public Surveillance Camera may continue for 90 days past the initial approval if a renewal application has not yet been acted upon by the CRC. However, if the Committee denies the renewal, or if the 90 day grace period expires, then the operation of the particular Public Surveillance Camera shall be discontinued immediately and the camera shall be removed.

15.5.1 Notwithstanding the foregoing, in the event that a renewal of a Public Surveillance Camera with a surveillance level of 3 or 4 is not obtained because of a lack of attendance at the CRC meeting, the authorization may continue for another 30 days if such continuation is approved by a majority of those in attendance at the meeting.

16 <u>ORDERS TO CEASE SURVEILLANCE ACTIVITY</u>

16.1 The CRC may, at any time and for any reason, rescind its approval of any Public Surveillance Camera previously authorized by the CRC. Any such rescission must be approved by at least three (3) members of the CRC.

16.2 The Chief of Police or other government official may submit a new application for authorization of said camera.

17 AUTHORIZED SURVEILLANCE ZONES & ADVISORY NOTICES

17.1 The range of each Public Surveillance Camera shall be limited in scope to a particular Authorized Surveillance Zone. The observational scope of any camera should be, to the extent practicable, no greater than necessary for the camera to accomplish its purpose, as described in the application. Any observation outside of the Authorized Surveillance Zones shall be considered a violation of these policies.

17.2 Privacy Zones and/or other appropriate technological measures such as Window Blanking may be programmed into the Camera Surveillance System, as required by the CRC or otherwise by law, to ensure that no Public Surveillance Camera surveys the interior of any residential or private property or surveys areas outside of the Authorized Surveillance Zone.

17.3 With the exception of non-disclosed cameras, fixed advisory notices notifying the public that a Public Surveillance Camera is in operation shall be posted in conspicuous locations proximate to each Public Surveillance Camera, and in the Authorized Surveillance Zone, indicating that the area is subject to Camera Surveillance.

17.3.1 Advisory notices shall be posted prior to the operation of Public Surveillance Cameras and may be removed from locations where Public Surveillance Cameras are no longer in operation.

17.3.2 Each such advisory notice must display a camera icon indicating the presence of a video camera. In addition to the camera icon, the notice must display the words "*This area is subject to camera surveillance by the City of Stamford.*"

17.3.3 All fixed advisory notices shall be readable at a reasonable distance within the Authorized Surveillance Zone, and must be printed in a bold universal typeset with a minimum letter size of 2.75 inches and shall be no less than 24 inches by 24 inches in dimension.

17.3.4 All advisory notices must be located in areas clearly visible to the public. In situations where it is not possible to affix a advisory sign due to site constraints, a comparable notice shall be prepared and located to the satisfaction of the Director of Public Safety, Health and Welfare.

17.4 In any location where there is an advisory notice as described in Section 17.3, there shall also be posted a public contact notice, instructing the public to contact the Director of Public Safety, Health and Welfare or his or designee in the event of any question or concern as to the Public Surveillance Camera in operation in that location and providing a telephone number for such contact.

17.5 The location of all Public Surveillance Cameras, other than non-disclosed cameras, shall be posted on the City of Stamford website.

18 AUTOMATIC IDENTIFICATION, FACIAL RECOGNITION TECHNOLOGY, ABERRATION SOFTWARE OR OTHER ENHANCEMENTS

18.1 The CRC recognizes that, within the available surveillance technology, equipment and software exists that operates independently of direct human control and is capable of automatically identifying specific perils such as fires as well as information such as the registration number of a vehicle or the facial features of an individual person or that is capable of recognizing unusual or unexpected behaviors or situations and reporting such identification or recognition in Real Time.

18.2 The CRC may generally authorize, and set forth policies and procedures for the use of, such enhancements described in Section 18.1 so long as there is reason to believe that the technology will assist in:

18.2.1 the apprehension or investigation of persons suspected of committing a serious crime;

18.2.2 the apprehension or investigation of persons of interest in a serious crime;

18.2.3 the locating of fires or other natural perils; or

18.2.4 the locating of missing persons or persons suffering from mental disorders including, but not limited to, the disease known as Alzheimer's.

18.3 The policies and procedures for the use of such enhancements shall provide authority to utilize such technology for specific incidents of the type listed in Section 18.2 above, and shall detail how such technology for shall be used in the event of such specific incidents and how the use of such technology shall be reported to the CRC.

18.4 Authorization of general policies and procedures for the use of such enhancements for the purposes listed in Section 18.2 above may only be granted by an affirmative vote of at least four (4) members of the CRC.

18.4.1 Notwithstanding the foregoing, the authorization of policies and procedures for the general use of such technology which could help locate fires and other natural perils shall require an affirmative vote of at least three (3) members of the CRC.

18.5 Any authorization by the CRC of the general use of such enhancements shall take effect only after written notification is made to the Board of Representatives. The Board of Representatives may reject any such authorization by a simple majority vote within 75 days of official notification by the CRC.

18.6 The CRC may, at any time by a simple majority vote, revoke the authorization for the general use of such enhancements.

18.7 The use and approval of any surveillance technologies beyond that contemplated in this manual shall be approved by the Board of Representatives.

19 TRAINING AND CONDUCT OF OPERATORS

19.1 All Operators shall receive training regarding the proper and legitimate use of the Camera Surveillance System, City of Stamford Police Department policies and the guidelines contained herein relating to privacy.

19.1.1 Each Operator shall sign a certificate that such Operator has received, read and understood the contents of this manual and acknowledges that such Operator understands that disciplinary action may be taken against him or her should it be proven that such Operator engaged in or supervised the unauthorized use or misuse of the Camera Surveillance System or otherwise breached these polices and procedures or any supplemental policies and procedures.

19.1.2 Only Operators who have received such training and have signed the above-referenced certificate may operate or monitor the Camera Surveillance System.

19.2 All Operators shall operate within and abide by the limitations set out in this policy manual. Any Operator failing to abide by said limitations may be subject to formal disciplinary proceedings and/or criminal prosecution.

19.2.1 Information obtained through use of the Camera Surveillance System shall be regarded as confidential and shall only be released in accordance with the provisions of this manual or as otherwise required by law. Any unauthorized disclosure of such information shall be investigated by the Director of Public Safety, Health and Welfare, and include actions up to and including formal disciplinary proceedings and/or criminal prosecution.

19.3 The CRC may issue written recommendations as to disciplinary measures to be taken in respect of any individual Operator.

19.4 The CRC shall have the right to approve or reject the training programs and selection procedures for Operators.

19.5 If practicable and as permitted by law, the CRC may require a closed circuit camera to be placed in the monitoring room to record the activities within the room.

19.5.1 The CRC or any member thereof shall have the discretion to view any feed or footage of activities within the monitoring room.

20 OPERATORS' LOG RECORDS

20.1 Logs, either written or electronic, shall be kept as a contemporaneous record of all monitored Public Surveillance Cameras, including all Operator actions. Any failure to keep full, accurate and contemporaneous logs shall be a

violation of the provisions of this policy manual. The CRC may request copies of written and/or electronic log records at any time and for any reason. All such logs shall be made available to the CRC at its monthly meetings in either electronic or written form.

20.1.1 Each Operator shall be assigned an individual user identification number which shall be entered in all logs to identify each Operator monitoring a Public Surveillance Camera.

20.2 If practicable, it is preferable that operators' logs of all monitored Public Surveillance Cameras be electronic and kept automatically.

21 REVIEW OF SURVEILLANCE AND MONITORING BY CRC

21.1 The CRC may request any information relating to the placement or use of Public Surveillance Cameras or the Camera Surveillance System from any operator, officer, official or other entity responsible for installing and using the Camera Surveillance System within the City of Stamford, including requiring any operator, officer, official or entity to attend and address the CRC in person.

21.2 Any member of the CRC may request access, upon 48 hours notice, to any Public Surveillance Camera and any Feed or Footage from such camera that has been actively monitored, reviewed by any person, requested under Freedom of Information provisions, or available as a Public Feed.

21.3 The CRC, or any individual member thereof, may request copies of any Material recorded by any Public Surveillance Camera. The copy of the requested Material shall be made available to the CRC within 10 working days of said request.

21.4 The CRC, or any individual member thereof, may request copies of an Operator's written and/or electronic log records at any time and for any reason.

21.5 The Chief of Police, the Mayor or the Director of Public Safety, Health and Welfare or any other governmental official with responsibility for investigating or prosecuting criminal activity may object to the granting of access and/or providing copies of requested Material if access would, based on reasonable judgment, jeopardize an on-going criminal investigation.

21.6 Any failure to grant access to any member of the CRC and/or any failure to provide copies of any requested Material shall result in an immediate requirement to cease and discontinue surveillance from all cameras involved in the request unless such access is reasonably denied as set forth herein in section 21.5.

21.7 The CRC, or any individual member thereof, may, without prior authorization, inspect the Monitoring Room, check the identity of any person in the Monitoring Room and examine all logs, video and photographic Material with the exception of any Material which may be stored under seal and which would require prior approval of a court of law before viewing.

21.8 The CRC, or any individual member thereof, may recommend to the Mayor, the Board of Finance or the Board of Representatives independent inspectors and/or consultants to carry out audits or inspections of any surveillance procedures.

22 RETENTION OF SURVEILLANCE MATERIAL

22.1 All Material obtained as a result of authorized surveillance shall be retained for a period of six (6) months or for a suitable further period as directed by the CRC or as required by record retention laws.

22.1.1 Images which are not required for the purposes for which the surveillance equipment is being used, or for the purposes for which the authorizations have been granted, or as evidence in a criminal matter, shall be permanently destroyed or erased upon the expiration of the six (6) month period or the suitable further period as described above or as required by law.

22.1.1.1 Notwithstanding the foregoing, no Material requested pursuant to a Freedom of Information request shall be destroyed earlier than the later of any retention period required by the Freedom of Information laws or thirty (30) days after the Freedom on Information request is finally resolved.

23 PUBLIC REQUESTS FOR ACCESS – FREEDOM OF INFORMATION REQUESTS

23.1 Upon written request, the public shall have access to any Material that is provided as a Public Feed.

23.2 There shall be no public access to Material exempted from public disclosure under the C.G.S. Freedom of Information Act or which is Material from Unmonitored Surveillance.

23.2.1 Notwithstanding the foregoing, public access to Material from Unmonitored Surveillance which is not exempted from public disclosure under the C.G.S. Freedom of Information Act may be requested in writing from the CRC, with a detailed explanation of why such Unmonitored Surveillance is requested. The CRC may grant access to such Material for a valid reason, subject to the provisions herein.

23.3 Any public access requests made under the C.G.S. Freedom of Information Act for information, data or images not available electronically on-line, or not already within the public domain, shall be dealt with in accordance with said Act. A copy of the relevant Material shall be produced and sent out to the individual promptly if no exemptions to public disclosure apply to the Material.

23.3.1 The Mayor, the Chief of Police, the Director of Public Safety, Health and Welfare or any other governmental official with responsibility for investigating or prosecuting criminal activity must be notified of all

Freedom of Information Act requests or public access requests to Unmonitored Surveillance within three (3) business days of said request and may object to the release of any Material on the following grounds:

23.3.1.1 the requested information is Confidential Information;

23.3.1.2 the requested Material is classified or sensitive; or

23.3.1.3 the release of the requested Material may prejudice an on-going investigation.

23.3.2 The Mayor, the Chief of Police, the Director of Public Safety, Health and Welfare or any other governmental official with responsibility for investigating or prosecuting criminal activity must notify the City of Stamford Freedom of Information Attorney of his or her objection to the release of the requested Material within five (5) working days of having been notified of the request.

23.3.3 Notwithstanding any objections to disclosure that may be made, Material shall be released if required by the G.G.S. Freedom of Information Act.

24 COMPLAINTS PROCEDURE

24.1 All complaints about the operation of, the location of and/or access to Material from any Public Surveillance Camera must be made in writing and addressed to the CRC or the Director of Public Safety, Health & Welfare, who shall keep a record of all such complaints and forward any such complaints directly to the CRC within ten (10) business days.

24.2 All complaints submitted to the CRC shall be reviewed for possible action.

25 POLICY OVERSIGHT

25.1 The Director of Public Safety, Health and Welfare shall conduct a biennial review of the Camera Surveillance System's effectiveness, impact on the community and adherence to the System's stated purpose.

25.1.1 The Director of Public Safety, Health and Welfare shall seek consultation, information and input from the community and may, in his or her discretion, hold public hearings or may solicit meetings with the community and other interest groups.

25.1.2 The Director of Public Safety, Health and Welfare shall produce and issue a public report to the CRC of his or her findings and may make recommendations as to whether to continue, cancel or alter the Camera Surveillance System.

25.1.2.1 The report of the Director of Public Safety, Health and Welfare will detail the reasons for his or her decision to continue, cancel or alter the Camera Surveillance System,

and will cite specific references to his or her findvings, conclusions and comments.

25.2 Upon review of the written biennial report of the Director of Public Safety, Health and Welfare, the CRC shall produce and issue a public report to the Board of Representatives of its findings and may make recommendations as to whether to continue, cancel or alter the Camera Surveillance System.

26 SUPPLEMENTAL CODES OF PRACTICE AND PROCEDURES

26.1 Nothing contained within this policy and procedures manual shall prohibit or prevent the City of Stamford Police Department or any other agency from developing and implementing supplemental codes of practices and/or operational procedures relating to the selection, training and discipline of Operators and/or the operation of the Monitoring Room provided they are not inconsistent with this manual or local, state, or federal law. In the event of any conflict, the most restrictive provisions contained herein shall take precedence over the provisions of any conflicting supplemental codes of practice or procedures.

26.2 Nothing contained in this policy and procedures manual, or in any other manual supplemental hereto, shall prevent the CRC from issuing written instructions, recommendations and/or updates from time to time. In the event of any conflict, the most restrictive provisions contained herein shall take precedence over the provisions of any other conflicting manual.

27 ADDITIONS AND AMENDMENTS

27.1 Amendments to this manual may be made only with the approval of the CRC and with the Board of Representatives' approval by simple majority vote.

28 ETHICS VIOLATIONS

28.1 Any violation of the policies and procedures set out in this manual shall be considered a violation of the Ethics Code of the City of Stamford and shall subject the violator to any and all consequences provided therein.