

April 22, 2024

Annual Surveillance Report



Reporting Period

January 03, 2022 - June 30, 2023

Prepared by

The Office of Oversight
and Public Accountability





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Letter from the Director



Hello Grand Rapids!

It is my honor to present you with the City's first annual surveillance report. While much work remains, this report is a meaningful stride toward our goal of organizational excellence. As the Director of the Office of Oversight and Public Accountability, I recognize that transparency and accountability are essential for any organization setting its sights on excellence in pursuit of that goal. I firmly believe that transparency and accountability are fostered in an environment where interdepartmental collaboration flows freely; stakeholder voices are elevated; and leadership regularly dialogues with the community on key decisions that will impact the day-to-day lives of citizens.

In observation of the City's commitment to accountability, this report affords the community an opportunity to remove the veil and peer into the City's use of surveillance equipment and surveillance services. Whether you're a stakeholder interested in departmental spending, or a community leader concerned with privacy rights, this report was drafted with you in mind. You will find that this report contains all surveillance that falls within the scope of Grand Rapids Administrative Policy 15-03 (rev'd. Jan. 3, 2022).

I would like to thank City Manager Washington for his tireless leadership and innovative approach to civilian oversight. I would also like to thank my colleagues for their contributions and willingness to collaborate. And last, but certainly not least, I would like to thank my staff for its concerted effort in gathering the data contained in this report. With that said, let's get back to work!

In service,

Brandon D. Davis, Esq.

Interim Managing Director
Office of Oversight & Public Accountability &
Office of Equity & Engagement





Governance And Oversight



§6 of Grand Rapids Administrative Policy 15-03 (“**AP 15-03**”) confers governance and oversight authority to the Office of Oversight and Public Accountability (“**OPA**”) and the Surveillance Oversight Committee (the “**SOC**”). Specifically, individuals with complaints regarding misuse or overuse of surveillance equipment or surveillance services may file complaints with OPA. The SOC, on the other hand, reviews all proposed operational and data management protocols and evaluates the necessity of a public hearing for departments requesting acquisition of new surveillance equipment or services.

Should OPA receive a complaint, it will conduct an investigative audit and prepare an audit summary. The audit summary will discuss whether surveillance equipment or surveillance services have been misused or overused, and whether there have been any other violations of AP 15-03 based on the complaint of surveillance use. § 6 further empowers OPA to initiative initiate an investigative audit even in absence of a citizen complaint. Upon completion of an audit summary, OPA shall forward a copy of the audit summary to the complainant, the City Manager, the SOC, and the applicable Department Director. OPA will also consult with the City Attorney’s Office to publish a redacted copy of the audit summary.

If an investigation reveals that surveillance equipment or services were employed in violation of AP 15-03, OPA will request corrective action from the SOC. Upon review, the SOC may disallow the use of surveillance equipment or services – in some instances doing so of its own volition. However, the City Commission may reinstate the use of surveillance equipment or services after following consideration by the Public Safety Committee.

The SOC may not engage in separate investigations, audits, witness interviews, or evidentiary hearings; but it may remand the case to OPA to conduct a supplemental investigation in cases where it deems the record inadequate to complete its review, it may remand the case to OPA to conduct a supplemental investigation. Upon completion of a supplemental investigation, OPA will provide a written report to the SOC, which summarizes the actions taken and the information received during the investigation. Representatives from the department alleged to be in violation of AP 15-03, OPA personnel, and the City Attorney’s Office will be present during the review process to provide information regarding the investigation’s scope and to answer any relevant legal questions.



Summary of Departmental Surveillance Use

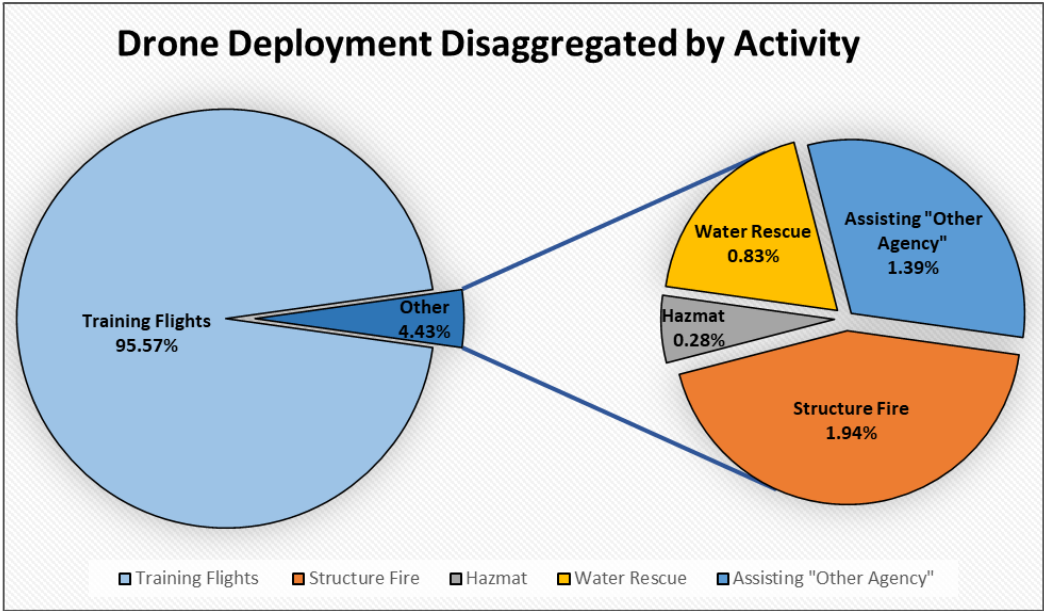
Pursuant to AP 15-03, this report covers instances of surveillance use from the date of revision (January 3, 2022) to the end of the first full fiscal year thereafter. City departments were given instructional materials to determine whether their use of surveillance equipment or surveillance services fell within the scope of reporting. Notably, the following equipment or services fall outside of AP 15-03's reporting scope: (1) a camera intended to record activity inside City buildings or facilities or at the entrances of City buildings or facilities; (2) a camera installed to monitor and protect the physical integrity of City infrastructure and City owned real property; (3) surveillance equipment acquired prior to March 24, 2015 or any subsequent replacement of that surveillance equipment that does not materially change the functions or capabilities of the equipment; and (4) equipment that is not capable of collecting identifiable information due to designed limitations in resolution and/or quality. See AP 15-03, § 1(b). Many City departments found that their use of surveillance equipment or surveillance services were exempt from reporting under § 1 of AP 15-03. However, OPA provided direct guidance to the following departments:

- The City Clerk's Office regarding its use of video monitoring for absentee ballot drop boxes as required by MCL 168.761d – Exempt because the camera is installed to monitor and protect the physical integrity of City infrastructure and City owned real property;
- The City Treasurer's Office regarding its use of the Avigilon security camera system to detect cashier errors – Exempt because the camera system is intended to record activity inside or at the entrance of a City building or facility;
- Mobile GR regarding its use of traffic cameras to monitor real time traffic patterns through intersections and its ownership of DASH buses with cameras installed, operated, and accessible only by The Rapid – exempt because the camera is installed to monitor and protect the physical integrity of City infrastructure or City owned real property, and exempt because it does not result in the acquisition of data by the City department, respectively;
- The Grand Rapids Police Department (“**GRPD**”) regarding its use of an Automated License Plate Recognition System – exempt because the surveillance equipment was acquired prior to March 24, 2015 and subsequent replacements of that surveillance equipment have not materially changed the functions or capabilities of the equipment. While the use of an Automated License Plate Recognition System is exempt from reporting, if a community member has a complaint regarding the use of this system or wants more information on how to file a complaint generally, please visit OPA's website.

Following a City-wide inquiry, three departments were identified as possessing reportable surveillance use – (1) the Grand Rapids Fire Department (“**GRFD**”), (2) GRPD, and (3) Mobile GR. In creating this report, OPA relied on self-disclosed third party surveillance information, which included GRFD's drone flight logs and GRPD's complaint disposition reports.

Grand Rapids Fire Department

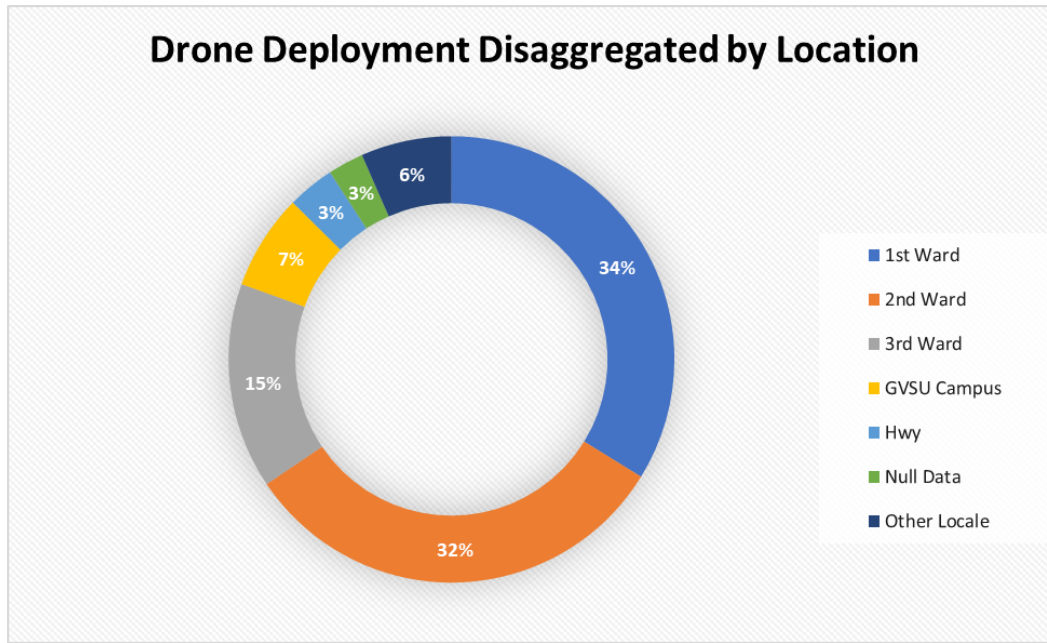
During the reporting period, GRFD employed the Autel Drone. GRFD used this drone for water rescue training, pilot training, hazmat, and surveillance of structure fires in Kent County. GRFD reported that it did not share or receive any data from any external person or entity while the Autel Drone was operated, with exception to the DroneSense Platform. [1] The section below provides insight into the geographic deployment areas disaggregated by ward, flight objective, and flight time.



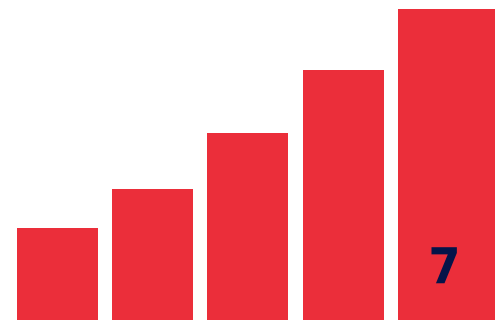
GRFD conducted **361** total drone flights. Training accounted for approximately 95.57% of total flights. **7** flights were deployed for structure fire incidents, representing 1.94% of the total. A single flight for hazardous material (hazmat) response accounted for 0.28% of the total. **3** flights consisted of water rescue operations, constituting about 0.83% of the total. And **5** flights aided neighboring agencies, comprising roughly 1.39% of the total.

1 DroneSense Platform: A software company that focuses on providing solutions for managing and coordinating unmanned aerial systems (UAS), commonly known as drones, in various industries such as public safety, emergency response, law enforcement, and more. Their software platform is designed to assist organizations in effectively utilizing drones for critical missions by offering tools for real-time communication, collaboration, data management, and situational awareness.

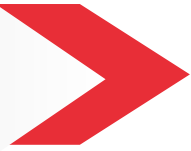
Grand Rapids Fire Department



During the specified reporting period, GRFD deployed drones across all City Wards and locales. The majority of drone flight hours occurred in the City's First Ward, accounting for approximately **10.84** hours. Similarly, the Second Ward saw significant drone activity, consisting of approximately **10.18** flight hours. The Third Ward, on the other hand, showed comparatively low drone deployment, accumulating **4.78** hours of flight time. Additional locales included Grand Valley State University's Campus, accounting for **2.22** flight hours; deployment over highways and express ways, accounting for **1.1** flight hours; and other non-specified and null data, accounting for **2.94** flight hours. With all wards and locales considered, GRFD deployed the Autel Drone for approximately **32.06** hours. GRFD also reported recurrent visits to certain locales, such as GRFD branches and MacKay-Jaycees Family Park. GRPD frequented these locations for training purposes.



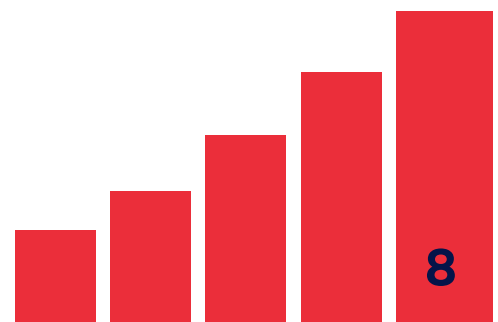
Grand Rapids Fire Department



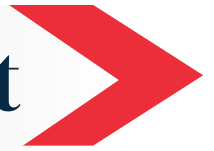
Investigative Audits, Source of Funding, and Annual Cost

GRFD reported zero drone deployments subject to a warrant or non-warrant form of court authorization. The City did not receive any complaints regarding the misuse or overuse of surveillance equipment or services, and OPA did not conduct an investigative audit of GRFD's surveillance use.

GRFD spent **\$2,376.00** of its departmental budget to operate, maintain, and deploy the Autel Drone during this reporting period. Those funds were disbursed for two annual licenses for continued use of the DroneSense Platform. GRFD procured the Autel Drone itself during a previous budgeting cycle, resulting in zero dollars spent for this reporting period.



Grand Rapids Police Department



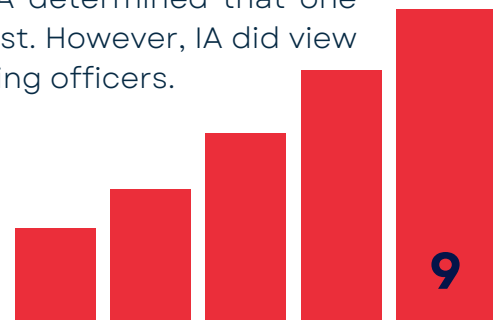
GRPD's reporting obligations under AP 15-03 differ from any other City department – insofar as it uses surveillance equipment on a daily basis, and therefore, accumulates voluminous amounts of surveillance data. This accumulation stems from GRPD Policy 8-12.1, which mandates that all sworn law enforcement personnel wear Body-Worn Cameras (“**BWC**”) while on duty. Accordingly, § 6(e) of AP 15-03 requires that GRPD “only report alleged or actual failure to use [BWCs] or In-car video”

In observation of this requirement, GRPD reported two instances of actual failure to use a BWC and OPA is aware of one instance of alleged failure to use a BWC. In each instance, the involved officers either failed to activate their BWCs or had their BWCs disabled during duty. Notably, GRPD's Internal Affairs Unit (“**IA**”) identified the violations while investigating other aspects of citizen complaints. Details surrounding the events giving rise to the referenced complaints are contained in complaint disposition reports CR 22-036, CR22-019/CR 22-038, and CR 22-057, which are maintained by IA and subject to redacted disclosure under the Freedom of Information Act.

CR 22-036 contains the first reported instance of alleged or actual failure to activate a BWC. The events giving rise to this complaint occurred on March 14, 2022, when officers were dispatched to the complainant's home in response to an emergency call. The complainant's home was located in the near the intersection of Fuller Ave. NE and Aberdeen St. NE. The complainant, a 56 year-old, white male, had excessively called emergency services that day. Before officers arrived, the Complainant called 911 again, stating that he did not want to speak with officers any longer.

When officers finally arrived, the complainant refused to come outside of his home and refused to state why he had continuously and repeatedly called 911. Officers parked their patrol vehicles around the corner, out of the complainant's sight, then approached the complainant's home and waited for him to step out of his front door. When the complainant opened the screen door of his home and leaned outside the threshold, an officer grabbed him by the arm. While trying to effectuate an arrest, the complainant fell to the ground just outside his door.

On May 25, 2022, the complainant filed a complaint with IA, alleging that an officer had placed him in a headlock and slammed him to the ground when he “poked his head out of his door.” While investigating the complaint, IA determined that one responding officer failed to activate his BWC during the arrest. However, IA did view the complainant's arrest through the BWC of fellow responding officers.



Grand Rapids Police Department



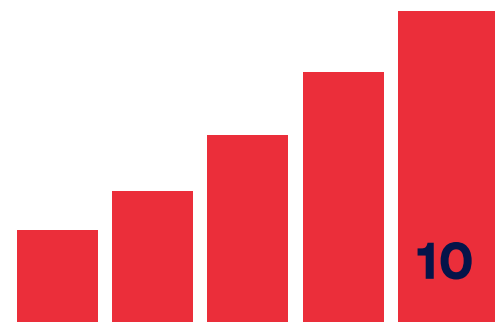
CR 22-019 and CR 22-038 contain the second alleged or actual failure to activate a BWC. The events giving rise to these complaints occurred on April 4, 2022, near the intersection of Nelson Ave. SE and Griggs St. SE, during an officer-involved shooting that resulted in the death of a 26-year-old, black male, Congolese Refugee. It was alleged that the then-officer's BWC deactivated for a period during a physical encounter with the decedent. Shortly after the shooting occurred, GRPD's Chief filed an internal complaint against the former officer, alleging unreasonable force.

During a press conference on April 13, 2022, the Chief confirmed that the former officer's BWC had been depressed for more than three seconds during the physical encounter, and therefore deactivated. The Chief further explained that the former officer's BWC later reactivated by way of a triggering event, but it failed to capture the application of deadly force.[2] Despite the former officer's BWC deactivating during the physical encounter, GRPD obtained further footage of the incident through multiple third-party recordings.[3]

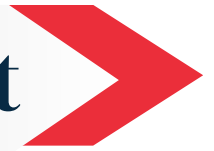
On June 9, 2022, the Kent County Prosecutor's Office announced charges of second-degree murder against the former officer, in connection with the deadly force incident. That same day, the Chief filed another internal complaint against the former officer – this time alleging unbecoming conduct. On June 16, 2022, IA sustained the allegation of unbecoming conduct against the former officer and terminated his employment. The internal complaint for unreasonable force, however, remains open.

² Triggering events may include, but are not limited to, (de)activation of a taser or activating a nearby squad car's overhead lights.

³ GRPD also obtained video footage from a third party's cellphone, a third party's home surveillance system, and the former officer's in-car video.



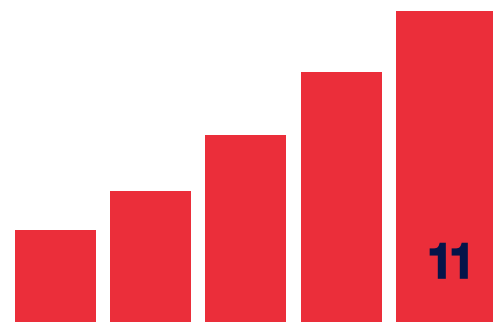
Grand Rapids Police Department



CR 22-057 contains the third reported instance of alleged or actual failure to activate a BWC. The events giving rise to this complaint occurred on July 26, 2022, when officers responded to reports of a 54 year-old, black male breaking and entering at a location near 28th St. SE. Responding officers determined that the complainant had used a rented tire truck to smash into the building's east rear door for entry.

Officers eventually located the abandoned tire truck parked in an alley near Jefferson St. SE. While conducting an on-foot search for the complainant, officers were flagged down by a resident near Lafayette St. SE. The resident motioned toward the bushes where they believed the complainant was hiding. Review of the complaint report revealed that the officer feared that the complainant possessed weapons, a K9 officer was deployed. After the K9 deployment, the complainant jumped from the bushes and fled on-foot. Officers yelled for the complainant to stop, explaining that his continued flight would result in a K9 use of force. The complainant feigned surrender, but ultimately continued his flight. As a result, officers initiated a K9 apprehension – leading to the complainant being bitten by a K9 officer.

On August 26, 2022, the complainant filed a complaint with IA, alleging excessive force during apprehension. While investigating the complaint, IA found that an officer failed to re-activate his BWC during apprehension. Despite this, IA reviewed the entire K9 apprehension through a fellow responding officer's BWC.



Grand Rapids Police Department

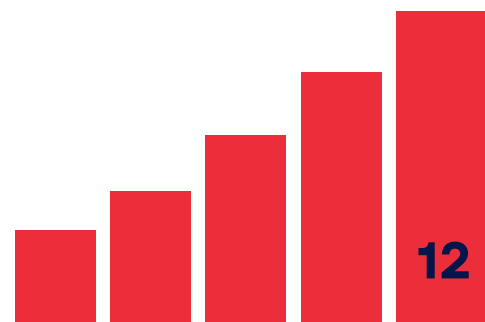


Investigative Audits, Source of Funding, and Annual Cost

The City did not receive any complaints regarding the misuse or overuse of GRPD's reported surveillance equipment or services during the reporting period. OPA did not conduct an investigative audit of GRPD's reported surveillance, which consisted solely of the three instances involving actual or alleged failure to activate a BWC in total.

GRPD spent approximately **\$1,045,131.27** of general fund dollars on BWCs during the reporting period. In addition, OPA paid **\$913,435.16** of general fund dollars for BWCs. Moving forward, funds for BWCs (and other Axon produced public safety technology) will come from OPA's general fund. [4]

⁴ GRPD's surveillance expenditures for FY24 will likely increase, as the department had acquired drones (also known as "Unmanned Aerial Systems" or "sUAS") by the date of this report's publication.



Mobile GR



In April 2018, Mobile GR acquired two automated license plate recognition systems (“**LPR**”). In August of 2019, Mobile GR acquired an additional LPR – bringing its total to three. During the reporting period, Mobile GR utilized the LPRs in the City’s Residential Parking Permit Zones and Pay-by-Plate areas. Due to technological difficulties, however, Mobile GR was unable to produce the surveillance data gathered by way of the LPRs during the reporting period.

Investigative Audits, Source of Funding, and Annual Cost

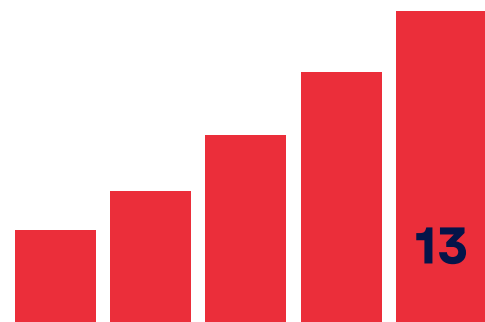
A department’s intentional failure to provide surveillance data in accordance with AP 15-03 constitutes a violation of the City’s Surveillance Policy. In this instance, OPA determined that whereas Mobile GR failed to provide required surveillance data, this failure was unintentional. The rationale for the determination is listed below.

OPA worked alongside Mobile GR to determine the cause of the department’s inability to capture and report the surveillance data gathered via the LPRs. After much discussion, it was ultimately determined that the LPR data export files had to be changed from native format to “.xml” for reporting purposes; but such a change never occurred during the reporting period.

In an effort to recover the reportable LPR surveillance data, Mobile GR sent the historical files (in native format) to its vendor, EDC Corp. Unfortunately, EDC Corp. determined that the historical files could not be converted to “.xml” configuration after the fact. Because of this, Mobile GR could not produce its reportable surveillance data.

The LPRs are not currently in use and haven’t been used in over a full calendar year. Mobile GR fully cooperated with OPA during the entirety of this inquiry and meticulously turned every stone in an effort to provide the requested data. The above-listed information combined with the relative newness of AP 15-03’s reporting requirements resulted in the determination that the failure to provide information was unintentional. Going forward, Mobile GR plans to reinstitute its use of the LPRs, and, at such time, it will work with its vendor to ensure that the data is converted into “.xml” for reporting purposes.

Mobile GR reported zero use of the LPR subject to a warrant or non-warrant form of court authorization. To our knowledge, the City has not received any complaints regarding the misuse or overuse of Mobile GR’s surveillance equipment or services during the reporting period. Mobile GR spent approximately **\$208,012.02** of general fund dollars for the LPRs and related software during the reporting period.



| Impact on Civil Rights & Liberties

§ 6(d)(vii) of AP 15-03 requires that OPA analyze “any discriminatory, disparate, and other adverse impacts the use of [surveillance] technology may have had on the public’s civil rights and civil liberties, including but not limited to those guaranteed by the First, Fourth, and Fourteenth Amendment to the United States Constitution” Due to the limited amount of surveillance data available during the reporting period, this analysis only includes relevant areas of law. [5]

First Amendment

The First Amendment provides that Congress make no law respecting an establishment of religion or prohibiting its free exercise. It protects freedom of speech, the press, assembly, and the right to petition the Government for a redress of grievances.

At this time, OPA cannot identify any discriminatory, disparate, or other adverse impact of the public’s First Amendment rights by either GRFD or GRPD’s use of surveillance technology.

Fourth Amendment

The Fourth Amendment protects citizens from unreasonable search and seizure. It prohibits the government from conducting any searches without a warrant and requires that such warrants be issued by a judge and based on probable cause.

At this time, OPA cannot identify any discriminatory, disparate, or other adverse impact of the public’s Fourth Amendment rights by GRFD

⁵ Mobile GR’s LPR use will not be analyzed, as the department could not produce such data.

| Impact on Civil Rights & Liberties

Fourth Amendment

In the context of policing, claims of excessive force during an arrest are governed under the Fourth Amendment – because an arrest constitutes “seizure” of the person. See *Graham v Connor*, 490 US 386, 388; 109 S Ct 1865; 104 L Ed 2d 443 (1989). Generally, claims of excessive force require a totality of the circumstances review, which includes available in-car camera and BWC footage.

During the reporting period, there were three instances of actual or alleged failure to activate a BWC: (1) CR 22-036, which involved a 56-year-old, white male, in the City’s Second Ward; (2) CR 22-019/CR 22-038, which involved a 26-year-old, black male, Congolese Refugee in the City’s Third Ward; and (3) CR 22-057, which involved a 54-year-old, black male, in the City’s First Ward. AP 15-03 requires an analysis of whether there have been any discriminatory, disparate, or other adverse impact that was caused by GRPD’s actual or alleged failure to activate a BWC, disaggregated by age, race, gender, and location. Due to the limited data set currently available, this determination cannot be made at this time.

In CR 22-036, the complainant alleged that officers used excessive force while effectuating arrest. In spite of the arresting officer’s failure to activate his BWC, IA had access to the BWCs of fellow responding officers. The footage showed the entire arrest from a third person perspective, thus allowing IA to holistically review the arresting officer’s conduct. Accordingly, OPA finds the arresting officer’s failure to activate his BWC caused no adverse impact on the complainant’s Fourth Amendment rights.

In CR 22-019 and CR 22-038, two internal complaints related to an officer-involved shooting, the former officer’s BWC deactivated during a physical encounter with the decedent. The entirety of the officer-involved shooting incident can be observed through a combination of footage, which includes the former officer’s BWC, in-car camera footage, a third-party cellphone recording, and a third-party home surveillance system recording. Due to ongoing litigation and an undisposed internal complaint against the former officer, OPA is unable to render a determination on whether the deactivation of the former officer’s BWC adversely impacted the decedent’s Fourth Amendment rights. OPA anticipates submitting a formal request for documentation related to this incident when the ongoing litigation concludes.

In CR 22-057, the complainant alleged that officers used excessive force when they initiated a K9 apprehension. Despite one officer’s failure to re-activate his BWC during the complainant’s arrest, IA had access to the BWCs of at least two other responding officers. The BWC footage available to IA offered multiple angles of the incident, thus allowing for a holistic review of the K9 deployment and apprehension. Therefore, OPA finds that the officer’s failure to re-activate his BWC did not have an adverse impact on the complainant’s Fourth Amendment rights.

| Impact on Civil Rights & Liberties

Fourteenth Amendment

The Fourteenth Amendment, in relevant part, forbids state denying any person "life, liberty or property, without due process of law" or to "deny[ing] to any person within its jurisdiction the equal protection of the laws."

At this time, OPA cannot identify any discriminatory, disparate, or other adverse impact on the public's Fourteenth Amendment rights by either GRFD or GRPD's reported use of surveillance technology.



Looking Forward

Grand Rapidians should expect changes in next year's annual surveillance report. The City Commission approved GRPD's acquisition of UAS surveillance equipment on August 22, 2023. GRPD's UAS surveillance equipment categorically falls into the reporting scope of AP 15-03, which will allow OPA to conduct a thorough statistical analysis – disaggregated by race, gender, and geographical location. In addition, funds for BWCs (and other Axon produced public safety technology) will come exclusively from OPA's general fund. Additionally, Mobile GR plans to reactivate its LPRs sometime in the near future – this data will also undergo a thorough statistical analysis.



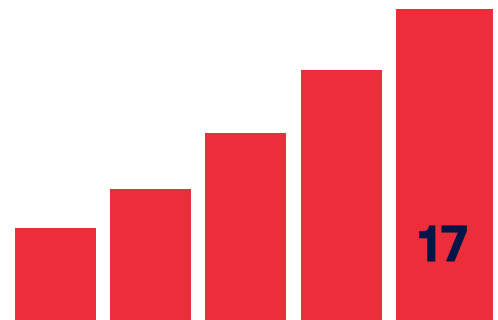
616-456-4OPA



OPA@grcity.us



<https://t.ly/RJlfC>




Appendix



CITY OF
GRAND
RAPIDS

ADMINISTRATIVE POLICY

SUBJECT	ACQUISITION AND USE OF SURVEILLANCE EQUIPMENT AND SURVEILLANCE SERVICES		
NUMBER	15-03	SIGNED DATE	3-24-2015
ISSUED BY	Mark Washington, City Manager 		
PREPARED BY	Brandon Davis, Director of Oversight and Public Accountability		
REVISED	1-3-2022		
ASSOCIATED POLICIES	City Commission Policy #800-02		
CITY VALUES	<div><input checked="" type="checkbox"/> Accountability<input checked="" type="checkbox"/> Collaboration</div> <div><input checked="" type="checkbox"/> Customer Service<input checked="" type="checkbox"/> Equity</div> <div><input checked="" type="checkbox"/> Innovation<input type="checkbox"/> Sustainability</div>		

SUMMARY

This policy provides a framework and expectations for the acquisition and use of surveillance equipment and surveillance services by department of the City of Grand Rapids.

PURPOSE

To establish a uniform policy to be followed by City departments when acquiring surveillance equipment and services for use in City operations including, but not limited to, ensuring the safety of persons and property, and the investigation of illegal behavior, and to ensure that the privacy interests of Grand Rapidsians are considered in the decision to acquire, use, or deploy new surveillance equipment or surveillance services.

1. Definitions

Audit summary: formal report issued or adopted by the Office of Oversight and Accountability, or their representative as a result of an audit of activities conducted by the City of Grand Rapids, its departments, and or employees that fall within the scope of this policy. An audit summary will include, but not be limited to an accounting of the date of the audit, steps used during the process, a summary of evidence reviewed, and conclusions drawn from the evidence.

Data management protocols: Those procedures governing how data collected by surveillance equipment and surveillance services will be retained, stored, indexed, and accessed.

Data mining: The computational process of discovering patterns in large data sets with the goal to extract information from data and transform it into an understandable structure for further use.

Extenuating circumstances: Incidents involving a good faith belief that an imminent danger to individual safety or public health is likely.

Imminent danger: A hazard exists which could reasonably be expected to cause death or serious physical harm immediately or before the imminence of such hazard can be eliminated through normal compliance enforcement procedures.

Natural disaster: Catastrophic events resulting from natural processes of the Earth that can cause fatalities, property damage and social environmental disruption. Michigan's most common natural disasters include floods, severe storms, winter storms, wildfires, power outages, and tornadoes.

Operational protocols: Those procedures governing how and when surveillance equipment or surveillance services may be used and by whom.

Surveillance equipment: Shall include

- a. Equipment capable of capturing or recording data, including images, video, photographs or audio operated by or at the direction of a City department or City employee, which may deliberately or inadvertently capture activities of individuals on public or private property; and
- b. Drones or unmanned aircraft and any attached equipment used to collect data. "Surveillance equipment" shall not include:
 - i. a camera intended to record activity inside City buildings or facilities or at the entrances of City buildings or facilities;
 - ii. a camera installed to monitor and protect the physical integrity of City infrastructure and City owned real property; and
 - iii. surveillance equipment acquired prior to March 24, 2015 or any subsequent replacement of that surveillance equipment that does not materially change the functions or capabilities of the equipment.
 - iv. equipment that is not capable of collecting identifiable information due to designed limitations in resolution and/or quality.

Surveillance services: Services provided to a City Department by a third party, whether public or private, that result in the acquisition of data, including information, images, video, personal or household behavioral information, photographs or audio, by the City department to be used for the purpose of monitoring, observing or analyzing individuals or groups of individuals regardless of whether such data is obscured, de-identified or

anonymized before or after acquisition. Surveillance services already utilized by the City prior to March 24, 2015 shall be exempt from the requirements of this policy unless the provider materially changes the functions or capabilities of those services.

Weaponize: To operate and or utilize surveillance equipment or surveillance services equipped with weapons (firearms, bombs, or other weapons), outfit surveillance equipment or surveillance services with weapons (firearms, bombs, or other weapons), or discharge weapons (firearms, bombs, or other weapons) attached to surveillance equipment or surveillance services.

2. **Requests for Acquisition of Surveillance Equipment or Services**

Any City department intending to acquire, use, or deploy new surveillance equipment or surveillance services after March 14, 2015 shall obtain City Commission approval prior to the initial acquisition, use, or deployment of that equipment or service. Once authority is granted to acquire, use, or deploy new surveillance equipment or surveillance services, a City department does not have to seek authority for each individual use or deployment of the same surveillance equipment or surveillance service, so long as the department does not exceed the grant of authority provided to the department at the time of the original authorization to acquire, use or deploy surveillance equipment or services. The process by which a City department shall seek to obtain City Commission approval is as follows:

- a. **Update to Public Safety Committee and Request for a Public Hearing** a City department shall first provide a briefing regarding the requested surveillance equipment to the Public Safety Committee of the Grand Rapids City Commission at a properly noticed meeting called pursuant to provisions of the Open Meetings Act and the City department shall also request that the Public Safety Committee set a public hearing on this matter before the Grand Rapids City Commission. Should the Public Safety Committee deny a request for a public hearing, or any other approvals in this process, the City Manager may bring a request before the entire City Commission for reconsideration.
 - i. The Briefing must include a description of all proposed Operational Protocols and Data Management protocols associated with the use of this technology.
- b. **Public Hearing Before the Grand Rapids City Commission.** The acquisition, use, or deployment of new surveillance equipment or surveillance services shall not be approved without holding a properly noticed public hearing before the Grand Rapids City Commission.
- c. **Fiscal Approval.** Request to acquire new surveillance equipment or surveillance services shall be presented to the Fiscal Committee of the City Commission, at a properly noticed and posted meeting called pursuant to the Open Meetings Act.
- d. **Standard of Approval.** The decision to acquire, use, or deploy new surveillance equipment or surveillance services shall be made in the best interest of Grand Rapidsians.

- i. Decisions to approve the acquisition, use, or deployment of new surveillance equipment or surveillance services shall consider the fiscal impacts of the purchase, community impact, privacy interest of impacted individuals, and ensure that the uses of the technology will not be based upon discriminatory practices or factors.

3. **Operational Protocols**

In requesting approval for acquisition, use, or deployment of surveillance equipment or surveillance services, City departments shall include proposed protocols containing the following information along with any other information specifically requested by the Public Safety Committee and/or the City Commission:

- a. A clear statement describing the purpose and use of the proposed surveillance equipment;
- b. The type of surveillance equipment to be acquired and used;
- c. A description of the general location where the surveillance equipment is to be used, which shall include the type(s) of location(s) and neighborhood(s) where the equipment is to be used, but need not include the precise location where each piece of equipment is to be placed;
- d. How and when the department proposes to use the surveillance equipment, such as whether the equipment will be operated continuously or used only under specific circumstances, and whether the equipment will be installed permanently or temporarily;
- e. A description of privacy rights that may be affected by the installation and use of the surveillance equipment;
- f. A mitigation plan describing how the department's use of the equipment will be regulated to protect individual privacy, to the extent reasonably practical;
- g. A description of how and when data will be collected and retained and who will have access to data captured by the surveillance equipment;
- h. The extent to which activity will be monitored in real time as data is being captured and the extent to which monitoring of historically recorded information will occur;
- i. If more than one department will have access to the surveillance equipment or the data captured by it, a lead department shall be identified that is responsible for maintaining the equipment and ensuring compliance with the requirements of this policy. If the lead department intends to delegate any related responsibilities to other departments and city personnel, these responsibilities and associated departments and personnel shall be clearly identified;
- j. Whether a department intends to share access to the surveillance equipment or the collected data with any other governmental entity and a general description of the type of incidents in which information sharing may occur. (The mere sharing of information with another governmental entity does not automatically fall within the jurisdictional authority of this policy and does not necessitate reporting, unless the information sharing could have been reasonably foreseen

and therefore should have been disclosed in compliance with this section of this policy);

- k. A description of the training to be provided to operators or users of the surveillance equipment; and
- l. An assessment identifying with specificity:
 - i. any potential adverse impacts the surveillance technology, if deployed, might have on civil liberties and civil rights; and
 - ii. what specific, affirmative measures will be implemented to safeguard the public from potential adverse impacts.

4. **Data Management Protocols**

Prior to operating surveillance equipment that is acquired after March 24, 2015, City departments shall submit to the City Commission written protocols for managing the data collected by such surveillance equipment. These data management protocols shall address the following:

- a. The time period for which any data collected by surveillance equipment will be retained;
- b. The methods for storing recorded information, including how the data is to be labeled or indexed;
- c. How the data may be accessed, including who will be responsible for authorizing access, who will be allowed to request access, and acceptable reasons for requesting access;
- d. A viewer's log or other comparable method to track viewings of any data captured or collected by the surveillance equipment, including the date, time, the individuals involved, and the reason(s) for viewing the records;
- e. A description of the City personnel or departments who have authority to obtain copies of the records and how the existence and location of copies will be tracked;
- f. A general description of the system that will be used to store the data; and
- g. A description of the department or individuals responsible for ensuring compliance with the requirements of this policy.

5. **Data Mining**

Prior to conducting data mining procedures that analyze existing data in a new way, where such data mining may impinge on the privacy of an individual citizen, City Departments shall submit to the City Commission written protocols containing (A) the information required for Data Management Protocols as defined in Section IV, substituting "any products of data mining" for "data" in those protocols and (B) the following operational protocols.

- a. A clear statement of the purpose of the proposed data mining.
- b. A description of the privacy rights that may be affected by the data mining.
- c. A mitigation plan describing how the data mining will be regulated to protect individual privacy to the extent reasonably possible.

- d. A description of how and when the data to be mined has been and will be collected and retained.
- e. A description of who will have access to the products of the data mining and with whom those products may be shared together with procedures for preventing and tracking unauthorized access.

6. **Governance and Oversight**

- a. **Complaints.** Individuals with complaints regarding misuse or overuse of surveillance equipment and/or surveillance services may file complaints with the Office of Oversight and Public Accountability. Individuals with complaints regarding other violations of this policy may also file complaints with the Office of Oversight and Public Accountability. The Staff of the Office of Oversight and Public Accountability will conduct an investigative audit and prepare an audit summary regarding whether surveillance equipment and/or surveillance services have been misused or overused and whether there have been any other violations of this policy. The Staff of the Office of Oversight and Public Accountability is authorized to initiate investigative audits without having a received a complaint from members of the public. Complaints regarding the actions of individual officers will be lodged and investigated in compliance with CCP 800-02, Section 2, titled "Investigation of Complaints." The mere fact that a complaint is filed regarding the surveillance policy does not automatically make the complaint eligible for review by the Grand Rapids Police Department Civilian Appeal Board.

Upon completion of the audit summary, the Office of Oversight and Public Accountability will provide a copy to the Complainant, City Manager, and the Department Director. After consultation with the City Attorney's Office, OPA will also publish the audit summary (redacted to the extent required by law) on the City's Website for review by the public. The Office of Oversight and Public Accountability will also provide the Public Safety Committee with copies of audit summaries and request action from the Public Safety Committee if an investigation finds that action is taken in violation of this policy.

To the extent allowed by law, Departments are directed to cooperate with the Office of Oversight and Public Accountability's reviews, audits, and reports and provide the Office of Oversight and Public Accountability with access to records, information and staff as requested to complete its investigation.

- b. **Surveillance Oversight Committee**

The Public Safety Committee of the Grand Rapids City Commission shall serve as the City's Surveillance Oversight Committee.

As such, the Public Safety Committee shall review all proposed Operational Protocols and Data Management protocols associated with the use of this

technology and evaluate whether a public hearing should be held to allow the new surveillance equipment or surveillance services.

The Public Safety Committee shall also review audit summaries provided by the Office of Oversight and Public Accountability. After review of the audit summaries, the Public Safety Committee shall be empowered to disallow the use of said surveillance equipment or surveillance services on its own motion. In the event that the use of surveillance equipment is disallowed, its use can be reinstated by the City Commission after consideration by the Public Safety Committee. For the purpose of all matters governed by this policy, the position of the advisory members of the Public Safety Committee must be reflected in the minutes of the Public Safety Committee and any resolutions, items, memorandums, or similar documents regarding matters governed by this policy.

The Public Safety Committee is not authorized to engage in separate investigations, audits, to interview witnesses, or to hold evidentiary hearings, but it may remand the case to the Office of Oversight and Public Accountability to conduct supplementary interviews with the complainant, the departments involved, and witnesses in the event that it considers the record to be inadequate to complete its review. The Office of Oversight and Public Accountability will provide a written report to the Public Safety Committee summarizing the actions taken and information received during the supplemental audit investigation. Representatives of the department alleged to be in violation of this policy, the Office of Oversight and Public Accountability, and the City Attorney's Office will be present during the review process to provide information regarding the scope of the investigation and to answer legal questions.

c. Surveillance Use Reports

In any quarter that surveillance equipment or surveillance services are used, departments utilizing surveillance equipment and/or surveillance services shall prepare a quarterly Surveillance Use Report. A copy of that report shall be provided to the Office of Oversight and Public Accountability for review.

Surveillance Use Reports shall detail the following:

- i. A clear statement describing the purpose and specific use of the surveillance equipment or surveillance services used;
- ii. The type of surveillance equipment or services used;
- iii. The approximate amount of time the surveillance equipment was used;
- iv. A description of the general location where the surveillance equipment was used, which shall include the ward(s) and nearest intersections(s) where the equipment was used;

d. Annual Surveillance Report

The Office of Oversight and Public Accountability shall annually submit to the Public Safety Committee and make available of the City's website an Annual Surveillance Report. The Annual Surveillance Report shall, at a minimum, include the following information:

- i. A summary of which surveillance technology was used and how it was used;
- ii. Whether and how often collected surveillance data was shared with and received from any external persons or entities, and the justification for the disclosure (information shared during the course of criminal investigations are specifically exempted from this provision);
- iii. Where applicable, a breakdown of where the surveillance technology was deployed geographically, by ward;
- iv. Whether the reported monitoring was subject to (A) a warrant, and (B) a non-warrant form of court authorization;
- v. A summary of complaints or concerns that were received about the surveillance technology, to the extent possible disaggregated by race, gender, age and ward;
- vi. The results of any internal audits, any information about violations of the Surveillance Use Policy, and any actions taken in response;
- vii. An analysis of any discriminatory, disparate, and other adverse impacts the use of the technology may have had on the public's civil rights and civil liberties, including but not limited to those guaranteed by the First, Fourth, and Fourteenth Amendment to the United States Constitution, to the extent possible disaggregated by race, gender, age, and ward; and
- viii. Total annual costs for the surveillance technology, and what source of funding was used to fund the technology, excluding personnel.

e. Transparency Requirements

The City shall maintain, on a website accessible to the public, a full listing of all approvals issued by the City Commission for acquisition or use of surveillance equipment or surveillance services, along with the operational and data management protocols that have been approved for such surveillance equipment or services.

For the purposes of the reporting aspects of this policy, disclosure of detailed information that would significantly interfere with an ongoing investigation may be withheld until the conclusion of the investigation. Even during an ongoing investigation, departments are still required to disclose the use of surveillance equipment or services and other non-detailed information or services to the Office of Oversight and Public Accountability.

Additionally, given the high frequency regarding the use of Grand Rapids Police Department Body Worn Cameras and In-car video, the Grand Rapids Police

Department needs only to report alleged or actual failure to use Body Worn Cameras or In-car video. Reporting regarding Body Worn Cameras and In-car video should be provided on a quarterly basis.

The City shall also, as part of its annual fiscal plan, separately identify public funds budgeted for the acquisition of new surveillance equipment that is subject to this policy.

7. **Policy Updates and Changes**

Changes to this policy shall be made by the City Manager. The City Manager shall inform the Public Safety Committee of the City Commission of any changes prior to the changes taking force and the changes shall be posted on the City's website.

8. **Prohibited Uses**

- a. Surveillance equipment shall not be used to harass, intimidate, or discriminate against any individual or group.
- b. Surveillance equipment shall not be utilized to conduct personal business of any type.
- c. Except as approved by the City Manager, or their designee, in Extenuating Circumstances, surveillance equipment shall not be weaponized.

9. **Temporary Exemption for Surveillance Equipment or Surveillance Services Used in Extenuating Circumstances**

- a. Notwithstanding the above policy provisions, City Departments may acquire and use new surveillance equipment or surveillance services in extenuating circumstances without following the provisions of this policy prior to such acquisition or use. Extenuating circumstances also include natural disasters or severe weather emergencies.
- b. A City Department that acquires or uses new surveillance equipment or services under the extenuating circumstances exception to this policy shall report such acquisition or use to the Office of Oversight and Accountability within 72 hours of the use or acquisition of the surveillance equipment or services. A City Department that acquires or uses new surveillance equipment or services under the extenuating circumstances exception to this policy shall also report such acquisition or use to the in addition to providing the operational and data management protocols to the Public Safety Committee of the Grand Rapids City Commission at the next scheduled Public Safety Committee meeting. Use of new surveillance equipment or services in connection with this exception, is limited to the qualifying extenuating circumstances event or instance. At the conclusion of the extenuating circumstances instance, the City Department shall immediately discontinue the use of the new surveillance equipment or services and seek approval from the City Commission for the permanent acquisition and use of surveillance equipment or other surveillance services as dictated in Admin 15-03.

10. Exemption for Replacement Surveillance Equipment or Surveillance Services

- a.** City Departments may acquire and use new surveillance equipment or surveillance services that are substantially similar to surveillance equipment or surveillance services that were previously approved in accordance with this policy in order to replace equipment due to failure without following the provisions of this policy prior to such acquisition or use.
- b.** Equipment failure refers to any event in which any equipment cannot accomplish its intended purpose or task. It may also mean that the equipment stopped working, is not operating properly, or is scheduled for a contractual routine upgrade with substantially similar equipment.
- c.** Should a department seek to acquire, use or deploy additional amounts of surveillance equipment or services that have previously been approved in compliance with this policy, the department need only provide notice to the Public Safety Committee and seek fiscal approval from the City Commission's Fiscal Committee.
- d.** Nothing in this section is intended to exempt City departments from other governance or reporting requirements detailed in this policy.

Listing of Approved Equipment

ACQUISITION AND USE OF SURVEILLANCE EQUIPMENT AND SURVEILLANCE SERVICES, pursuant to Administrative Policy 15-03, adopted March 24, 2015:

Transparency Requirements

The City shall maintain, on a website accessible to the public, a full listing of all approvals issued by the City Commission for acquisition or use of surveillance equipment or surveillance services, along with the operational and data management protocols that have been approved for such surveillance equipment or services.

The City shall also, as part of its annual fiscal plan, separately identify public funds budgeted for the acquisition of new surveillance equipment that is subject to this policy.

APPROVED:

March 10, 2015 - Police Department Body-Worn Cameras Pilot Program

Operational and data management protocols are outlined in [Administrative Policy 15-01](#), dated March 10, 2015, Section 3: Procedures

April 2017 – Mobile GR – Automated License Plate Readers

*City Commission Approval to solicit bids adopted May 9, 2017 Proceeding No. 86726
Operational and data management protocols are outlined in [Item 10.1 of April 11, 2017 Committee of the Whole \(page 286\)](#)*

August 2017 – Fire Department – Unmanned Aerial Vehicle Program

City Commission approval of policy and operational protocols and approval to solicit bids adopted September 12, 2017, Proceeding No. 87061. GRFD Policy and Standard Operating Guidelines. [Presented at Public Hearing August 22, 2017 \(Proceeding No. 87028\) Item 13.1 \(pages 268-291\)](#)

August 2023 – Police Department – Small Unmanned Aerial System (sUAS)

City Commission authorizes an Agreement with Unmanned Vehicle Technologies for the purchase of small Unmanned Aerial System technology for the Grand Rapids Police Department, adopted August 22, 2023. [Resolution authorizing a goods and services agreement with Unmanned Vehicle Technologies to procure small Unmanned Vehicle System technology.](#)



UNDERSTANDING THE SURVEILLANCE POLICY

A SUMMARY OF ADMINISTRATIVE POLICY 15-03

HISTORY AND PURPOSE OF ADMINISTRATIVE POLICY 15-03

AP 15-03 was significantly revised in recent years. The purpose of this policy is to establish a uniform policy to be followed by City Departments when acquiring surveillance equipment and services for use in City operations including, but not limited to, ensuring the safety of persons and property; the investigation of illegal behavior; and ensuring that the privacy interests of Grand Rapidians are considered in the decision to acquire, use, or deploy new surveillance equipment or surveillance services. These revisions were made in partnership with the NAACP and other community members. The revisions were officially adopted in January 2022.

MAJOR REVISIONS TO ADMINISTRATIVE POLICY 15-03

- Expanded Purpose Statement
- Added Definitions to Better Explain Terms
- Elevated Resident Voice in Acquisition Process and Added a Public Hearing Requirement
- Created a Standard of Approval - "Best Interest of Grand Rapidians"
- Added Explicit Equity Considerations
- Created a Governance Structure
- Established the Public Safety Committee as the Surveillance Oversight Committee
- Increased Transparency by Adding Annual Reports
- Established Prohibited Uses
- Removed and Replaced Exigent Circumstances with Extenuating Circumstances

PROCESS FOR ACQUISITION OF SURVEILLANCE EQUIPMENT

1. Approval of City Manager to bring a request forward
2. Provide an update to the Public Safety Committee and request a public hearing
 - Description of Operational & Data Management Protocols
3. Public Hearing (Community Input) before the City Commission
4. Official request to acquire equipment through the Fiscal Committee - if approved placed on the Consent Agenda
5. City Commission makes the final decision regarding acquisition of surveillance equipment

STANDARD OF APPROVAL - BEST INTEREST OF GRAND RAPIDIANS

The decision to acquire, use, or deploy new surveillance equipment or surveillance services shall be made in the best interest of Grand Rapidians. Decisions to approve the acquisition, use, or deployment of new surveillance equipment or surveillance services shall consider the fiscal impacts of the purchase, community impact, privacy interest of impacted individuals, and ensure that the uses of the technology will not be based upon discriminatory practices or factors.

SECTION BREAKDOWN OF THE SURVEILLANCE POLICY

01

DEFINITIONS

Section 1 provides definitions of key terms found in AP 15-03.

02

REQUEST FOR ACQUISITION

Section 2 details the process by which a City Department can request to acquire, use, or deploy new surveillance equipment or services.

03

OPERATIONAL PROTOCOLS

Section 3 explains what must be included in the operational protocols for surveillance technology. This includes an assessment of any potential impact on civil rights.

04

DATA MANAGEMENT PROTOCOLS

Section 4 requires departments to create and adhere to data management protocols.

05

DATA MINING

Section 5 protects privacy by governing the computation of patterns, based on large data sets used to extract information.

06

GOVERNANCE AND OVERSIGHT

Section 6 empowers community to file complaints with the Office of Oversight and Public Accountability and establishes the Public Safety Committee as the Surveillance Oversight Committee.

07

POLICY UPDATES AND CHANGES

Section 7 requires the City Manager to inform to the Public Safety/Surveillance Oversight Committee of changes to this policy.

08

PROHIBITED USES

Section 8 explicitly prohibits the use of surveillance equipment to harass, intimidate, or discriminate. It further prohibits any and all weaponization, except in extenuating circumstances with the approval of the City Manager.

09

TEMPORARY EXEMPTION FOR SURVEILLANCE EQUIPMENT OR SURVEILLANCE USE IN EXTENUATING CIRCUMSTANCES

Section 9 allows for temporary use or purchase of surveillance equipment in extenuating circumstances. Extenuating circumstances are incidents involving a good-faith belief that an imminent danger to individual safety or public health is likely.

10

EXEMPTION FOR REPLACEMENT SURVEILLANCE EQUIPMENT OR SURVEILLANCE SERVICES

Section 10 allows departments to acquire and use substantially similar surveillance technology that was previously approved in accordance with this policy, to replace equipment due to failure without renewing the acquisition process.

ANNUAL SURVEILLANCE REPORT AT A GLANCE

REPORTING PERIOD: JANUARY 3, 2022 TO JUNE 30, 2023

ADMINISTRATIVE POLICY 15-03

Section 6 of AP 15-03 confers governance and oversight authority to the Office of Oversight and Public Accountability (“**OPA**”) and the Surveillance Oversight Committee (the “**SOC**”). Individuals with complaints regarding misuse or overuse of surveillance equipment or services may file complaints with OPA. The SOC reviews all proposed operational and data management protocols and evaluates the necessity of a public hearing for departments requesting acquisition of new surveillance equipment or services.

SURVEILLANCE

Surveillance Equipment is equipment capable of capturing or recording data, including images, video, photographs or audio operated by or at the direction of a City department or City employee, which may deliberately or inadvertently capture activities of individuals on public or private property; as well as drones or unmanned aircraft and any attached equipment used to collect data.

Surveillance Services are services provided to a City Department by a third party, whether public or private, that result in the acquisition of data, including information, images, video, personal or household behavioral information, photographs or audio, by the City department to be used for the purpose of monitoring, observing or analyzing individuals or groups of individuals regardless of whether such data is obscured, de-identified or anonymized before or after acquisition. Surveillance services already utilized by the City prior to March 24, 2015 shall be exempt from the requirements of this policy unless the provider materially changes the functions or capabilities of those services.

NON-SURVEILLANCE

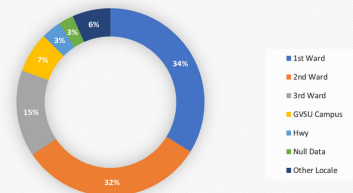
Non-Surveillance is:

- Anything that does not meet the criteria of a surveillance service or surveillance equipment.
- A camera intended to record activity inside City buildings or facilities or at the entrances of City buildings or facilities.
- A camera installed to monitor and protect the physical integrity of City infrastructure and City owned real property.
- Surveillance equipment acquired prior to March 24, 2015 or any subsequent replacement of that surveillance equipment that does not materially change the functions or capabilities of the equipment.
- Surveillance services already utilized by the City prior to March 24, 2015, unless the provider materially changes the functions or capabilities of those services.
- Surveillance equipment that is incapable of collecting identifiable information due to designed limitations in resolution and/or quality.

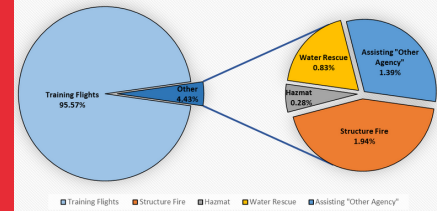


- During the reporting period, the Fire Dept. conducted **361 total drone flights** for water rescue training, pilot training, hazmat, and surveillance of structure fires in Kent County.
- The Fire Dept. reported **zero** drone deployments subject to a warrant or non-warrant form of court authorization.
- The City did not receive any complaints regarding the misuse or overuse of surveillance equipment or services, and OPA did not conduct an investigative audit of the Fire Dept.'s surveillance.
- Funds spent: **\$2,376.00**.
- No discriminatory, disparate, and other adverse impacts on the public's civil rights and civil liberties identified.

Drone Deployment Disaggregated by Location



Drone Deployment Disaggregated by Activity



Mobile GR

- During the reporting period, Mobile GR utilized an automated license plate recognition system ("**LPR**") in the City's Residential Parking Permit Zones and Pay-by-Plate areas.
- Due to technological difficulties, however, Mobile GR was unable to produce the LPR surveillance data. For more information, please refer to the Annual Surveillance Report.
- Mobile GR reported **zero** use of the LPR subject to a warrant or non-warrant form of court authorization.
- The City has not received any complaints regarding the misuse or overuse of surveillance equipment or services.
- Funds spent: **\$208,012.02**



- The Police Dept.'s surveillance differ from any other City department, as it uses Body-Worn Cameras ("**BWC**") and In-Car Video daily. As it stands, AP 15-03 requires that the Police Dept. report *alleged* or *actual* failure to use BWC or In-Car video.
- The Police Dept. reported **two** instances of **actual** failure to use a BWC, and OPA is aware of **one** instance of **alleged** failure to use a BWC.
- In each instance, the involved officers either failed to activate their BWC or had their BWC disabled in the line of duty. Details surrounding the events giving rise to the referenced complaints are contained in complaint disposition reports **CR 22-036**, **CR22-019/CR 22-038**, and **CR 22-057**, which are maintained by Internal Affairs and subject to redacted disclosure under the Freedom of Information Act.
- Internal Affairs discovered the violations while handling other non-surveillance related complaint allegations.
- The City did not receive any complaints regarding the misuse or overuse of the Police Dept.'s use of BWC during the reporting period, and OPA did not conduct an investigative audit of the Police Dept.'s BWC surveillance.
- Funds spent: **\$1,045,131.27** by GRPD and **\$913,435.16** by OPA.
- No discriminatory, disparate, and other adverse impacts on the public's civil rights and civil liberties identified.