



# Policy 1605

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<b>6 July 2023</b>	<b>1 of 6</b>

*By Order of the Police Commissioner*

## POLICY

The purpose of this policy is to provide guidance for the proper operation and data management of the Department's use of Location Service (LS) technology. LS maps the deployment of members and vehicles in real time, and stores historical location data while on duty. Members who are required to use and/or are assigned authorization to view LS data shall do so in accordance with the procedures listed in this policy.

## CORE PRINCIPLES

**Officer Safety.** In providing sworn members' locations in real-time, supervisors will be able to support officer assignments based on incidents and their proximity, efficiently deploy an adequate number of members based on situational need, and/or provide assistance to officers if reporting their location is inhibited or unknown.

**Effective Deployment and Management of Resources.** LS provides supervisors with real-time spatial awareness of resources to overlay with event details in order to deploy sworn members in an effective, data-driven manner, as well as to provide historical location data for analysis and review.

**Privacy Protection.** A breach in member GPS location data security, careless handling of member GPS location data, and/or intentional viewing, sharing, and release of member GPS location data to non-authorized individuals could jeopardize the privacy and safety of the BPD member and the general public. Accordingly, BPD members and authorized users shall take the utmost care and caution to ensure that GPS data is not mishandled or misused. To ensure member's GPS location data is not available when not on duty, radios must be turned off.

## DEFINITIONS

**Activation** – Enabling GPS services to provide location of the electronic device.

**Administrative Investigative Functions** – Investigations that occur where no citizen/police interaction is occurring or likely to occur (e.g., observing CitiWatch cameras, querying computer databases, reviewing reports, conducting covert surveillance, etc.).

**Authorized Personnel** – Personnel approved by executive members who will have access to real-time and historical locations of members in the line of duty.

**Automatic Vehicle Location (AVL) Administrator** – A role assigned to a member who coordinates AVL System installation, maintenance, and coordinates data dissemination, when requested.

**Automatic Vehicle Location (AVL) System** – A system that collects the geographic location of a vehicle assigned, rented, or leased to the Department, and transmits data about the vehicle to a user interface in near-real time. The AVL System is used for the following operational purposes:

- Collecting vehicle odometer readings and usage,
- Viewing engine diagnostic data, measuring vehicle idling,
- Integrating GPS vehicle odometer data and work accomplishments into the Department's asset management systems,
- Locating a vehicle that may be involved in or in close proximity to an incident,
- Locating lost or stolen vehicles equipped with this technology,
- Enabling departments to offer proof of vehicle presence or absence, and
- Supporting response to claims associated with AVL-enabled vehicles and damage to AVL vehicles by third parties.

**Common Operating Platform (COP):** an application that receives location services information from sources outside the application (Radios, LPRs, ADS-B, etc.)

**Deactivation** – Turning off the GPS service to cease collecting GPS locations.

**Global Positioning Service (GPS)** – Satellite technology originally developed by the government to allow individuals to use an electronic unit to determine their exact location (within a margin of error).

**Legitimate Law Enforcement Purposes** – Includes any assigned duty in which a member is required to perform law enforcement, crime investigative, or administrative duties as a member of the BPD. This includes Routine Administrative Activities and Administrative Investigative Functions.

**LS Administrator** – Designees from BPD assigned to oversee and maintain the technical aspects of the location service application, management of data, and serve as the main point of contact with the service provider. regarding LS Data. The BWC Coordinator will serve as the LS Administrator for BWCs (See Policy 824, *Body-Worn Camera*) and the COP Administrator will serve as the LS Administrator for departmental GPS-enabled radios

**LS Body Worn Camera (BWC) Application** – GPS enabled body worn camera with authorized location access via Evidence.com.

**LS Data** – All spatial data created through the use of the AVL, BWC, and radios.

**LS Radio Application (LS Radio App)** – GPS-enabled radio.

**Routine Administrative Activities** – Activity such as report writing, roll call, remote arrest processing, etc., not likely to result in citizen/police interaction or enforcement related activity.

## **GENERAL**

1. Authorized Personnel will be provided with real-time location information of members with activated Body Worn Cameras (BWC) and powered on radios. LS Data will be available only to Authorized Personnel.

2. Location Service technology will only be used for spatial awareness, decision-making, deployment, and analysis of Legitimate Law Enforcement Purposes.
3. All LS Data are the property of the BPD.
4. Location information will be stored in authorized databases and available to layer with additional geo-spatial information such as calls for service. Radio LS Data will be retained for ninety (90) days and BWC data for a minimum period of (4) years. (See Policy 824, *Body-Worn Camera*).
5. Location information may only be accessed by Authorized Personnel. Credentials to access these data are managed by the LS Administrator.

## **DIRECTIVES**

### **Members**

6. The LS BWC service is installed on all Axon Body 3 (AB3) or later BWCs.
7. Location Service capability is available on GPS-enabled radios issued by BPD. The GPS-enabled radios will be provided to all sworn and selected civilian members. Selected civilian members will be determined by the Deputy Commissioner or designee of each Bureau for the civilian members under their command.
8. Activation and Deactivation of the LS BWC occur at the same times as when the BWC is activated and deactivated for recording purposes. (See Policy 824, *Body-Worn Camera*).
9. Activation and Deactivation of radio location services occur at the same times as when the radio is powered on and off, at the start and end of the member's tour of duty. This applies to all tours of duty, except where exempted, including regular duty, overtime, and approved BPD secondary employment conditioned on the actual or potential use of law enforcement powers by the member while in a BPD uniform (See Policy 1702, *Secondary Employment*).
10. All sworn and selected civilian members assigned a departmental BWC per Policy 824, *Body-Worn Camera* must maintain their BWC and radios on their person, charged, and powered on for the entirety of their tour of duty.
11. Members shall not tamper with or disable AVL devices or hardware.
12. Data collected by the AVL System may be used for the purposes of Fleet Management, Audits, and Officer Safety.

### **Issuance and Utilization of Radios**

13. All members shall be issued a department radio.
14. Members assigned to units whose primary duties involve interactions with citizens and/or enforcement related activities (e.g., Patrol, SWAT, K-9, WATF, RATT, DAT, etc.) shall wear the radio at all times while on-duty.

15. Because radio location services is activated when the radio is powered on, an exemption to radio location services requires an exemption from wearing or not powering on the radio. The following are duties and situations that DO NOT require the utilization of a radio:
  - 15.1. Members may be exempt from wearing the radio while performing limited activities such as Dive Team missions, physical fitness training, facilities maintenance, in-service training, off-duty court appearances, and range qualifications. For any other specific activities the member feels they should be exempted from wearing the radio, the member must receive permission by their permanent-rank supervisor or instructor overseeing the activity, and the exemption must be reported to the Communications Section.
  - 15.2. Members assigned to units whose primary duties are administrative (e.g., Communications, ECU, Quartermaster, RMS) or investigative (e.g., DDU, Homicide, Pawn Shop, Sex Offense, Child Abuse, etc.) are not required to wear radios during the normal course of their duties, unless:
    - 15.2.1. The member anticipates participating in enforcement or investigative activities (e.g., serving an arrest warrant, executing a search warrant etc.), or
    - 15.2.2. The member is detailed to work a uniformed assignment where citizen/police interaction is occurring, or is likely to occur (e.g., patrol, parade, baseball game, festival, Inner Harbor Detail, uniformed secondary employment, etc.), or
    - 15.2.3. The member is directed to wear the radio by a permanent-rank supervisor.
  - 15.3. Members assigned to Undercover Squad and/or Vice Units are exempt from wearing a radio while operating in an undercover capacity. Arrest team members assigned to Undercover and/or Vice Units shall wear their radio in accordance with this policy.

## **REQUIRED ACTION**

### **Authorized Personnel**

16. The LS Administrator shall provide permissions and access to members in accordance with this policy.
17. Authorized Personnel and their associated levels of permission will be selected by the Deputy Commissioner or designee of each Bureau for the members under their command based on the chain of command, decision-making authority, supervisory responsibilities, and analysis of administrative duties.
18. Authorized Personnel are permitted to view members' locations during the assigned tour of duty, and for review and analysis of previous events. The use of the LS Data requires a Legitimate Law Enforcement Purpose.

- 18.1. No member shall disseminate or share with non-Authorized Personnel the GPS locations of any member(s) for any reason absent expressed Deputy Commissioner or Legal approval.
19. Non-Authorized Personnel may request in an Administrative Report (Form 95) access to LS Data through their chain of command, with final approval by the Deputy Commissioner to whom the member reports.

**LS BWC Administrator (BWC Coordinator)**

20. The BWC Coordinator shall refer to Policy 824, *Body-Worn Camera* for the BWC Coordinator's responsibilities.

**COP Administrator**

21. The Data-Driven Strategies Division shall appoint the COP Administrator for radio LS Data, who shall be responsible for:
  - 21.1. Ensuring that radio LS Data is stored in authorized databases and retained for ninety (90) days. Working with the Information Technology Division if specific data identified within 90 days needs to be retained for a longer period of time.
  - 21.2. Maintaining user groups and permissions for Authorized Personnel, and assisting Authorized Personnel with establishing dashboards for maximizing spatial awareness.
  - 21.3. Disseminating information regarding any updates, changes, or malfunctions, as well as receiving any comments or concerns from members regarding functionality.
  - 21.4. Develop COP training and maintain a list of trained and Authorized Personnel.
  - 21.5. Maintaining statistical data on COP usage.
  - 21.6. Ensuring COP updates are completed.

**AVL Administrator**

22. The BPD's Asset Management Division shall appoint an AVL Administrator, who shall be responsible for:
  - 22.1. Maintaining all data and records related to the AVL System, and producing AVL System-generated data and records in response to public records requests, for internal audits to be conducted by the Compliance Bureau, or for officer safety related support. The AVL Administrator shall ensure that all data related to the AVL System are retained for a time period required by state law.
  - 22.2. Ensuring prompt maintenance of any defective or malfunctioning AVL Systems.
  - 22.3. Respond to all requests for technical support, audit services, or officer safety activity within two hours from 8am-4pm and 6 hours for all other timeframes.

**Communications Section**

23. On a periodic basis, the Communications Section shall review LS Data for accuracy and gaps in coverage. If inaccuracies or gaps are found, coordinate with Baltimore City Information and Technology (BCIT) department.

**Information Technology Division (ITD)**

24. ITD shall assist LS Administrators and the Communications Section for data retention or other technology needs.

**ASSOCIATED POLICIES**

Policy 701, *Department Radio Communication*  
Policy 824, *Body-Worn Camera*  
Policy 1114, *Persons in Police Custody*  
Policy 1307, *Communication Devices*  
Policy 1702, *Secondary Employment*

**COMMUNICATION OF POLICY**

This policy is effective on the date listed herein. Each employee is responsible for complying with the contents of this policy.