



Privacy Impact Assessment
for the

Keeping Schools Safe Initiative

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Abstract

Keeping Schools Safe is a research and development effort funded by the DHS Science & Technology Directorate (S&T) in support of the Alabama State Department of Homeland Security. The purpose of this pilot is to test the functionality and clarity of live streaming video technology for first responders and law enforcement applications in a school environment. A PIA is being conducted because images of individuals (volunteer Alabama law enforcement officials) will be captured during the field test. This PIA will only cover the research activities being conducted on behalf of S&T during this operational field test.

Overview

Title 3 of the Homeland Security Act assigns S&T the responsibility for conducting research in support of the Department's mission. Under Subchapter 3 §182, "the Secretary, acting through the Under Secretary for Science and Technology, shall have the responsibility for conducting basic and applied research, development, demonstration, testing, and evaluation activities that are relevant to any or all elements of the Department."

Keeping Schools Safe will support S&T's mission by testing the operational utility of live video streaming technology for first responders and law enforcement applications in a school environment. The objective of the project is to test the integration of the technology into currently available law enforcement capabilities for enhancing school safety. By testing the clarity and functionality of the system, researchers can determine the information sharing and situational awareness capabilities of the technology and its utility to law enforcement and first responders. The research activities will help Alabama law enforcement and first responders provide a qualitative evaluation of technology, from which a selection and evaluation committee (which includes members from Alabama Department of Homeland Security, Alabama state and local law enforcement and first responder communities, the Alabama Department of Justice, and the school boards for the schools participating in the tests) will decide whether to integrate it into existing school safety systems. The project will also help S&T develop a "lessons learned" or "best practices" guidebook that could serve as an implementation blueprint for other States.

The Alabama Department of Homeland Security already has a comprehensive situational awareness system in place through its *Virtual Alabama* platform. *Virtual Alabama* provides capabilities to first responders, such as the ability to access up-to-date images of large geographic areas (such as hurricane disaster zones) in order to plan and execute an appropriate response. S&T is providing support to the Alabama Department of Homeland Security's initiative to further enhance the platform's existing capabilities by providing funds to test commercially available live video streaming technologies using fixed cameras in selected Alabama public schools ("Keeping Schools Safe").

DHS S&T will provide funding to the U.S. Army's Space and Missile Defense Command (SMDC), which will conduct the testing and evaluation on behalf of the Alabama Department of Homeland Security. SMDC and the Homeland Protection Institute (HPI), a non profit technology deployment organization, will canvass and evaluate commercially available video streaming



technology from approximately 12 vendors. At the completion of this surveying process, the selection and evaluation committee will select one vendor to participate in the Keeping Schools Safe testing and evaluation. The selected vendor, working with the Alabama Department of Homeland Security and Alabama state and local law enforcement and first responders (hereafter referred to as "Alabama law enforcement") will install and test their systems at two designated Alabama schools, to demonstrate the capabilities of its streaming video technology.

Alabama law enforcement will conduct the testing (with the participation of the vendor and SMDC) on weekends when no children are present in the schools using volunteers from the Alabama state and local law enforcement and first responder communities. The testing will not involve capturing any images of children or other non-volunteer participants. Security cameras already located at the schools will capture images of volunteer participants. The images will be transmitted using the streaming video technology selected for the test to consoles at the police call centers near the schools, then transmitted from the police call centers to personal digital assistants (PDAs) carried by volunteers to test the functionality and utility of the technology. The objective of the test is to evaluate the ability of the test technology to transmit high quality streaming video images from the CCTV system in the schools to the consoles at the police call centers, and then to the PDAs held by law enforcement officials and first responders. If the technology transmits the images well, it would provide the capability for law enforcement officers and first responders outside the school to assess the status of events inside the school in order to plan and execute the best response and ensure the safety of the students.

Prior to the on-site testing, the vendor for the selected technology will have conducted extensive laboratory testing of the equipment and video technology capabilities. During the on-site testing, the vendor will employ encryption technologies to protect the wireless transmission of video images during the test.

S&T will not have access to any images collected or generated during the field tests. S&T will only have access to non-personally identifiable information related to the effectiveness and evaluations of the selected systems.

The system testing will include the following participants:

1. The Alabama Department of Homeland Security will select one vendor, who will provide the system for testing and manage the field test. The Alabama Department of Homeland Security will evaluate the functionality of the system in facilitating the transmission of streaming video and clarity of the resultant video viewed at the police call center or on a PDA during field testing. Alabama law enforcement personnel will serve as volunteer participants in the testing.
2. SMDC conducted the technology canvassing and evaluated approximately 12 potential vendors and will be present for the testing.
3. The vendors will apply their technologies to the law enforcement PDAs and provide technical support to users.



4. S&T will provide funding to SMDC for the field testing.

This PIA covers only S&T's research and development process. Should any Federal agency (including an operational DHS Component) acquire the technology being evaluated, that agency would conduct a separate PIA to cover operational use.

Section 1.0 The System and the Information Collected and Stored Within the System

The following questions are intended to define the scope of the information collected, as well as the reasons for its collection as part of the program being developed.

1.1 What information is to be collected?

(Please check the following if applicable)

The System's Technology Enables It to Record:

- Video**
 - Static Range: 100 meters (approximate; varies by school)
 - Zoom Range: x10
- Tracking**
 - Automatic (for example, triggered by certain movements, indicators)
 - Manual** (controlled by a human operator)
 - Sound
 - Frequency Range:

The System Typically Records:

- Passersby on public streets.
- Textual information (such as license plate numbers, street and business names, or text written on recorded persons' belongings).
- Images not ordinarily available to a police officer on the street:
 - Inside commercial buildings, private homes, etc.
 - Above the ground floor of buildings, private homes, etc.

None of the above. This testing will record **only** images of volunteer participants (Alabama law enforcement).

1.2 From whom is the information collected?

- General public in the monitored areas.
- Targeted populations, areas, or activities (please describe).**

This testing will record **only** images of volunteer participants (Alabama law enforcement).
- Training included directives for program officials to focus on particular people, activities, or places (please describe).



1.2.1 Describe any training or guidance given to program officials that directs them to focus on particular people, activities, or places.

All participants in this project will be instructed to capture only images of volunteers acting as test subjects.

1.3 Why is the information being collected?

- Crime prevention
- To aid in criminal prosecution
- For traffic-control purposes
- Terrorism investigation
- Terrorism prevention
- Other (please specify)**

The purpose of this project is to test the functionality and clarity of the technology in the proposed operating environment (Alabama schools) and assess the impact of the resultant improvements to information sharing and situational awareness. The capability of the system to share streaming video and images instantaneously between schools and police call centers would likely translate to quicker response times in situations routinely encountered in schools by first responders and law enforcement officials. The ultimate goal is to provide an environment in which law enforcement officials could remotely trigger streaming of the video images from the schools in the event of a criminal incident or other event that could endanger the occupants of the school. The purpose of this testing is to evaluate the ability of the test technology to transmit high quality images from the schools' CCTV systems to a console in the police call center, and then to PDAs used by law enforcement officials and first responders. (The vendor will employ encryption technologies to protect the wireless transmission of video images during the test.) If the technology transmits the images well, it would provide the capability for law enforcement officers and first responders outside the school to assess the status of events inside the school in order to plan and execute the best response and ensure the safety of the students.

1.3.1 Policy Rationale

- A statement of why surveillance cameras are necessary to the program and to the governmental entity's mission.**

S&T's mission is to conduct basic and applied research, development, demonstration, testing, and evaluation activities to support all elements of DHS. This research is testing a technology that would support the DHS mission of preventing criminal and terrorist acts by facilitating the instantaneous transmission of valuable operational information (i.e. images of emerging emergency situations, transmission of images of suspected explosive or unknown devices). The greatest benefit of the system is the



ability to quickly share information among law enforcement officials and first responders allowing critical decisions to be made based on real time situational awareness of a potentially life threatening event. This increased situational awareness will aid in the protection of school occupants and first responders alike.

- Crime prevention rationale: (for example, crimes in-progress may only be prevented if the cameras are monitored in real-time. Or, a clearly visible camera alerting the public that they are monitored may deter criminal activity, at least in the monitored area.)
- Crime investigation rationale: (for example, a hidden camera may be investigative but not preventative, providing after-the-fact subpoenaable records of persons and locations.)
- Terrorism rationale: (for example, video footage is collected to compare to terrorist watch lists.)

1.3.1.1 Detail why the particular cameras, their specific placement, the exact monitoring system and its technological features are necessary to advance the governmental entity's mission. For example, describe how low-light technology was selected to combat crime at night. It is not sufficient to merely state the general purpose of the system.

The ability to stream live video via a quick and robust connection with the police call centers may enhance information sharing and situational awareness of law enforcement personnel and first responders in the field to allow critical decisions to be made based on real time situational awareness of a potentially life threatening event. This increased situational awareness will aid in the protection of school occupants and first responders alike.

The tests will evaluate the utility of the application of streaming live video during law enforcement and first responder critical event activities involving schools, and help develop a best practices casebook that could serve as an implementation blueprint for other states.

1.3.1.2 It would be adequately specific, for example, to state that cameras which are not routinely monitored provide after-the-fact evidence in criminal investigations by providing subpoenaable records of persons and locations. Similarly, it would be appropriate to state, for example, that video footage is collected to compare to terrorist watch lists and wanted persons lists.

Live streaming video could be used to facilitate the instantaneous transmission of valuable operational information between a school, a police call center or other command center, and law enforcement officers or first



responders in the field. Transmitting this information remotely would enable critical decisions to be made based on real time situational awareness of a potentially life threatening event. This increased situational awareness will aid in the protection of school occupants and first responders alike. S&T is funding SMDC, who is working on behalf of the Alabama Department of Homeland Security, to conduct the field test in order to evaluate the operational utility of this capability in enhancing school safety.

1.3.1.3 How is the surveillance system's performance evaluated? How does the government assess whether the surveillance system is assisting it in achieving stated mission? Are there specific metrics established for evaluation? Is there a specific timeline for evaluation?

Currently, the existing security cameras at the selected schools are on a closed circuit, which means that no one outside the school's network (including law enforcement officers and first responders) has access to images or videos unless they physically enter the school and go to the location where the recorded video is stored. There is no technology in the schools to enable law enforcement and first responders to remotely access or share video streams from the school security cameras.

The purpose of this research is to determine whether the technologies being tested could potentially enhance the capability of law enforcement officials and first responders to make critical decisions based on real time situational awareness of a potentially life threatening event. This increased situational awareness will aid in the protection of school occupants and first responders alike. When this research is completed, the Alabama Department of Homeland Security will provide S&T with a qualitative evaluation of the system's performance based on its effectiveness in meeting the needs of law enforcement officers and first responders in responding to routine and emergency situations in schools.

1.3.2 Cost Comparison

Please describe the cost comparison of the surveillance system to alternative means of addressing the system's purposes.

Currently, there are only closed circuit security cameras at the two selected Alabama public schools, so the Alabama Department of Homeland Security has no cost comparison information. However, SMDC will provide the Alabama Department of Homeland Security with an evaluation of approximately 12 potential vendors, from which the Alabama Department of Homeland Security will select a vendor to participate in this test.



1.3.3 Effectiveness

- Program includes evaluation of systems performance (please describe how performance is evaluated.)**

The Alabama Department of Homeland Security will provide S&T with a qualitative evaluation of the effectiveness of the live video streaming system based on the results acquired from the field test.

- Evaluation includes metrics to measure success (for example, crime statistics.)
 Program includes a timeline for evaluation

1.4 How is the information collected?

- Real-time monitoring, with footage streamed, but not stored.

- Real-time monitoring with footage stored.**

All images will be stored on the Alabama Department of Homeland Security *Virtual Alabama* server for the evaluation period. At the conclusion of the testing and evaluation, the images will be destroyed.

- Footage not monitored, only stored.

1.4.1 Describe the policies governing how the records can be deleted, altered or enhanced, either before or after storage. Are there access control policies limiting who can see and use the video images and for what purposes? Are there auditing mechanisms to monitor who accesses the records, and to track their uses, and if so, are these mechanisms a permanent and unalterable part of the entire system? What training was conducted for officials monitoring or accessing the technology?

S&T will not have access to the images collected during the field test, and thus, will not store, delete, alter, or enhance the images.

The Alabama Department of Homeland Security will be the sole custodian of all images collected during the field test and will control access to and manage the information. The Alabama Department of Homeland Security will limit access to the images only to authorized personnel involved in the testing and evaluation and will not alter or enhance the images. The images will be deleted at the conclusion of the testing and evaluation process. As this is a testing activity utilizing only volunteer participants, there are no auditing mechanisms incorporated into the system. All participants will be instructed to capture **only** images of volunteers.

1.5 What specific legal authorities, arrangements, and/or agreements defined the surveillance system?

- Legislative authorization at the city or state level**

Title 3 of the Homeland Security Act of 2002 (Federal legislation) authorizes S&T to conduct this research.



The Alabama Department of Homeland Security was established by an act of the Alabama State Legislature and signed into law by Governor Bob Riley on June 18, 2003. Alabama's Homeland Security Department is staffed and organized to mirror the U.S. Department of Homeland Security. The mission of the Alabama Department of Homeland Security is to work with Federal, state, and local partners to prevent acts of terrorism in Alabama, to protect lives and safeguard property, and if required, to respond to any acts of terrorism occurring in Alabama. To accomplish this mission, the Alabama Department of Homeland Security works closely with both public and private sector stakeholders in a wide range of disciplines: law enforcement, emergency management, emergency medical, fire services, public works, agriculture, public health, public safety communications, environmental management, military, and transportation.

- Executive or law enforcement decision
- Decision-making process included public comment or review
- Entity making the decision relied on:
 - case studies
 - research
 - hearings
 - recommendations from surveillance vendors
 - information from other localities
 - other (please specify)

Funding:

- DHS Grant
- General revenues
- Law enforcement budget
- Other (please specify)**

This is a DHS S&T research pilot conducted on behalf of the Alabama Department of Homeland Security. S&T is funding SMDC through a contract to oversee testing and evaluation and perform program management for this project.

- Funding has limited duration (please specify)
- Funding renewal is contingent on program evaluation

Appendix is attached, including:

- Authorizing legislation
- Grant documents
- Transcript of public hearing or legislative session
- Press release
- Program manuals outlining the system's rules and regulations
- Other (please specify)

1.5.1 The section should also include a list of the limitations or regulations controlling the use of the video surveillance system. This may include existing law enforcement standards,



such as subpoenas and warrants, or surveillance-specific rules. For example, is a warrant required for tracking or identifying an individual?

The use of this system during the Keeping Schools Safe field test is limited to recording video of volunteer participants from the Alabama law enforcement for testing and evaluation purposes.

1.6 Privacy Impact Analysis

Given the amount and type of data collected, and the system's structure, purpose and use discuss what privacy risks were identified and how they were mitigated. If during the system design or technology selection process, decisions were made to limit the scope of surveillance or increase accountability, include a discussion of this decision.

Relevant privacy risks include:

- **Privacy rights.** *For example, the public cameras can capture individuals entering places or engaging in activities where they do not expect to be identified or tracked. Such situations may include entering a doctor's office, Alcoholics Anonymous, or social, political or religious meeting.*
- **Freedom of speech and association.** *Cameras may give the government records of what individuals say, do, and read in the public arena, for example documenting the individuals at a particular rally or the associations between individuals. This may chill constitutionally-protected expression and association.*
- **Government accountability and procedural safeguards.** *While the expectation is that law enforcement and other authorized personnel will use the technology legitimately, the program design should anticipate and safeguard against unauthorized uses, creating a system of accountability for all uses.*
- **Equal protection and discrimination.** *Government surveillance, because it makes some policing activities invisible to the public, poses heightened risks of misuse, for example, profiling by race, citizenship status, gender, age, socioeconomic level, sexual orientation or otherwise. Decisions about camera placement, and dynamic decisions about camera operation, should be the product of rationale, non-discriminatory processes and inputs. System decisions should be scrutinized with fairness and non-discrimination concerns in mind.*

The system will test the utility of live streaming video to law enforcement personnel responding to a critical event, i.e., shooting or hostage situation in schools to determine how law enforcement agents and agencies would benefit from this technology. The Alabama Department of Homeland Security will be the sole custodian of all images collected during the field test, will limit access to the images only to authorized personnel involved in the testing and evaluation, and will not alter or enhance the images. The images will be deleted at the conclusion of the testing and evaluation process. The vendor will employ encryption technologies to protect the wireless transmission of video images during the test. As this is a testing activity utilizing only volunteer participants, there are no auditing mechanisms incorporated into the system. However, all participants will be instructed to capture **only** images of volunteers.



The potential privacy risk associated with this field test is that images of individuals could be captured without their knowledge and consent, and that the images may be viewed by unauthorized personnel. To mitigate these risks, all personnel capturing video during the field test will be trained law enforcement officers who have been instructed to capture only images of volunteer participants, and the images will be deleted at the conclusion of the testing.

Section 2.0 – Uses of the System and Information

2.1 Describe uses of the information derived from the video cameras.

Please describe the routine use of the footage. If possible, describe a situation (hypothetical or fact-based, with sensitive information excluded) in which the surveillance cameras or technology was accessed for a specific purpose.

S&T is funding the field test to evaluate the operational utility of streaming video for use by law enforcement officers and first responders to make critical decisions based on real time situational awareness of a potentially life threatening event. This increased situational awareness will aid in the protection of school occupants and first responders alike. The images will be used only for the purposes of research, development, testing, and evaluation.

2.2 Privacy Impact Analysis

Describe any types of controls that are in place to ensure that information is handled in accordance with the above described uses. For example, is appropriate use of video covered in training for all users of the system? Are audit logs regularly reviewed? What disciplinary programs are in place if an individual is found to be inappropriately using the video technology or records?

The Alabama Department of Homeland Security will be the sole custodian of all images collected during the field test, will limit access to the images only to authorized personnel involved in the testing and evaluation, and will not alter or enhance the images. The images will be deleted at the conclusion of the testing and evaluation process. The vendor will employ encryption technologies to protect the wireless transmission of video images during the test. As this is a testing activity utilizing only volunteer participants, there are no auditing mechanisms incorporated into the system. However, all participants will be instructed to capture **only** images of volunteers. The images will be used only for the purposes of research, development, testing, and evaluation.

Section 3.0 – Retention

The following questions are intended to outline how long information will be retained after the initial collection.



3.1 What is the retention period for the data in the system (i.e., how long is footage stored)?

- 24-72 hours
- 72 hours – 1 week
- 1 week – 1 month
- 1 month – 3 months**
- 3 months – 6 months
- 6 months – 1 year
- more than 1 year (please describe)
- indefinitely

S&T will not have access to, retain, or store any images obtained during this field test. The Alabama Department of Homeland Security will be the sole custodian of the images and will delete them at the conclusion of the testing and evaluation process.

3.1.1 Describe any exemptions for the retention period (i.e. Part of an investigation or review)

None.

3.2 Retention Procedure

- Footage automatically deleted after the retention period expires
- System operator required to initiate deletion**
- Under certain circumstances, officials may override detention period:
 - To delete the footage before the detention period
 - To retain the footage after the detention period
 - Please describe the circumstances and official process for override

3.3 Privacy Impact Analysis:

Considering the purpose for retaining the information, explain why the information is maintained for the indicated period.

S&T will not have access to, retain, or store any information collected during the field test. The Alabama Department of Homeland Security will be the sole custodian of the images, will retain them for up to 3 months to support evaluation of the technologies being tested, and will delete them at the conclusion of the testing and evaluation process.

Section 4.0 – Internal Sharing and Disclosure

The following questions are intended to describe the scope of sharing *within* the surveillance operation, such as various units or divisions within the police department in charge of the surveillance system. *External sharing will be addressed in the next section.*



4.1 With what internal entities and classes of personnel will the information be shared?

Internal Entities

- Investigations unit
- Auditing unit
- Financial unit
- Property-crimes unit
- Street patrols
- Command unit
- Other (please specify)**
- None

S&T will not have access to or share the information. SMDC, the vendor, and volunteer participants from Alabama law enforcement will only have access to live, streaming video. Only the selection and evaluation committee will have access to the stored images for the purposes of testing and evaluation.

Classes of Personnel

- Command staff (please specify which positions)
- Middle management (please specify)
- Entry-level employees
- Other (please specify)**

S&T will not have access to or share the information. Individuals with access to streaming and/or stored images include SMDC, the vendor, Alabama Department of Homeland Security officials, Alabama state and local law enforcement and first responders, Alabama Department of Justice officials, and members of the school board for the schools participating in the testing.

4.2 For the internal entities listed above, what is the extent of the access they receive (i.e. what records or technology is available to them, and for what purpose)?

S&T will not have access to or share the information. SMDC, the vendor, and volunteer participants from Alabama state and local law enforcement and first responders will only have access to live, streaming video. Only the selection and evaluation committee will have access to stored images for the purposes of testing and evaluation.

4.2.1 Is there a written policy governing how access is granted?

- Yes (please detail)
- No**

S&T will not have access to or be authorized to grant access to this data. The Alabama Department of Homeland Security will authorize access to the images to support research, development, testing, and evaluation.



4.2.2 Is the grant of access specifically authorized by:

- Statute (please specify which statute)
- Regulation (please specify which regulation)
- Other (please describe)**
- None

S&T will not have access to or be authorized to grant access to the images and video. The Alabama Department of Homeland Security will authorize access to the images to support research, development, testing, and evaluation.

4.3 How is the information shared?

4.3.1 Can personnel with access obtain the information:

- Off-site, from a remote server**
- Via copies of the video distributed to those who need it
- Only by viewing the video on-site**
- Other (please specify)

S&T will not have access to or be authorized to grant access to the information. SMDC, the vendor, and volunteer participants from the Alabama state and local law enforcement and members of the first responder communities who are part of the testing team will only have access to live, streaming video via PDA. Only the selection and evaluation committee will have access to stored images for the purposes of testing and evaluation. During testing, the video will be transmitted via encrypted wireless connection from the CCTV system in the school to the console in the police call center to the PDAs carried by volunteers. The PDAs will not store the videos; all videos will be stored on the *Virtual Alabama* server.

Should the Alabama Department of Homeland Security integrate the technology into schools for operational use, a school official would manually trigger the transmission of video via a “panic button” mechanism in the event of an incident that threatened school safety. The Alabama Department of Homeland Security will develop policies to define these triggering events.

4.4 Privacy Impact Analysis:

Considering the extent of internal information sharing, discuss what privacy risks were identified and how they were mitigated. For example, discuss any access controls, encryption, training, regulations, or disciplinary procedures that will ensure only legitimate uses of the system within the department.

No internal DHS entities will have access to, be able to obtain access to, or be authorized to grant access to the images collected during the field test. SMDC, the vendor, and the volunteer participants will only have access to live, streaming video via PDA. The selection and evaluation committee will have access to stored images (images will be stored on the *Virtual Alabama* server) for the purposes of testing and evaluation.



The potential privacy risk associated with this field test is that images may be shared with unauthorized personnel. To mitigate these risks, all personnel capturing video during the field test will be trained law enforcement officers who have been instructed to capture only images of volunteer participants. SMDC, the vendor, and the volunteer participants will have access only to the live, streaming video (not the stored images). Individuals with access to the stored images (i.e., members of the selection and evaluation committee) will only use them for research, development, testing, and evaluation purposes, and will delete the images at the conclusion of the testing. The vendor will employ encryption technologies to protect the wireless transmission of video images during the test. Furthermore, the images stored on the Virtual Alabama server will be protected by a firewall, in accordance with relevant Alabama State laws and regulations on access control procedures.

Section 5.0 – External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to your operation – including federal, state and local government, as well as private entities and individuals.

5.1 With which external entities is the information shared?

List the name(s) of the external entities with whom the footage or information about the footage is or will be shared. The term “external entities” refers to individuals or groups outside your organization.

- Local government agencies (please specify)
- State government agencies (please specify)
- Federal government agencies (please specify)
- Private entities:
 - Businesses in monitored areas
 - Insurance companies
 - News outlets
 - Other (please specify)
- Individuals:
 - Crime victims
 - Criminal defendants
 - Civil litigants
 - General public via Public Records Act or Freedom of Information Act requests
 - Other (please specify)

The images will not be shared with any individuals or agencies outside the testing and evaluation teams.



5.2 What information is shared and for what purpose?

5.2.1 For each entity or individual listed above, please describe:

- The purpose for disclosure
- The rules and regulations governing disclosure
- Conditions under which information will not be disclosed
- Citations to any specific authority authorizing sharing the surveillance footage

The images will not be shared with any individuals or agencies outside the testing and evaluation team.

5.3 How is the information transmitted or disclosed to external entities?

- Discrete portions of video footage shared on a case-by-case basis
- Certain external entities have direct access to surveillance footage
- Real-time feeds of footage between agencies or departments
- Footage transmitted wirelessly or downloaded from a server
- Footage transmitted via hard copy
- Footage may only be accessed on-site

The images will not be shared with any individuals or agencies outside the testing and evaluation team.

5.4 Is a Memorandum of Understanding (MOU), contract, or agreement in place with any external organization(s) with whom information is shared, and does the MOU reflect the scope of the information currently shared?

- Yes
- No

If an MOU is not in place, explain steps taken to address this omission.

The images will not be shared with any individuals or agencies outside the testing and evaluation team.

5.5 How is the shared information secured by the recipient?

For each interface with a system outside your operation:

- There is a written policy defining how security is to be maintained during the information sharing
- One person is in charge of ensuring the system remains secure during the information sharing (please specify)
- The external entity has the right to further disclose the information to other entities



- The external entity does not have the right to further disclose the information to other entities
- Technological protections such as blocking, face-blurring or access tracking remain intact one information is shared
- Technological protections do not remain intact once information is shared

The images will not be shared with any individuals or agencies outside the testing and evaluation team.

5.6 Privacy Impact Analysis:

Given the external sharing, what privacy risks were identified? Describe how they were mitigated. For example, if a sharing agreement is in place, what safeguards (including training, access control or assurance of technological privacy protection) have been implemented to ensure information is used appropriately by agents outside your department/agency?

The privacy risk is that unauthorized personnel could gain access to the images. To mitigate that risk, the images will not be shared with any individuals or agencies outside the testing and evaluation team.

Section 6.0 – Technical Access and Security

6.1 Who will be able to delete, alter or enhance records either before or after storage?

- Command staff
- Shift commanders
- Patrol officers
- Persons outside the organization who will have routine or ongoing access to the system (please specify)
- Other (please specify)**

The images will not be altered or enhanced after the field test, and only the selection and evaluation committee, as authorized by the Alabama Department of Homeland Security, shall have access privileges to the stored video. All images will be deleted at the conclusion of testing and evaluation.

6.1.1 Are different levels of access granted according to the position of the person who receives access? If so, please describe.

- All authorized users have access to real-time footage**
- Only certain authorized users have access to real-time footage (please specify which users)
- All authorized users have access to stored data
- Only certain users have access to stored data (please specify which users)**



The selection and evaluation committee has access to stored video for the purposes of research, development, testing, and evaluation.

- All authorized users can control the camera functions (pan, tilt, zoom)
- Only certain authorized users can control the camera functions
- All authorized users can delete or modify footage
- Only certain authorized users can delete or modify footage (please specify which users)

6.1.2 Are there written procedures for granting access to users for the first time?

- Yes (please specify)
- No**

6.1.3 When access is granted:

- There are ways to limit access to the relevant records or technology (please specify)
All records will be stored on the Alabama Department of Homeland Security's Virtual Alabama server, which has limited access and is protected by a firewall, in accordance with relevant Alabama State laws and regulations on access control procedures.
- There are no ways to limit access

6.1.4 Are there auditing mechanisms:

- To monitor who accesses the records?
 - To track their uses?
- Auditing mechanisms will not be used during this testing period.

6.1.5 Training received by prospective users includes discussion of:

- Liability issues
- Privacy issues
- Technical aspects of the system
- Limits on system uses**
- Disciplinary procedures
- Other (specify)**
All participants will be instructed to capture only images of volunteer participants.
- No training

The training lasts:

- None
- 0-1 hours**
- 1-5 hours
- 5-10 hours
- 10-40 hours
- 40-80 hours
- More than 80 hours



The training consists of:

- A course
- A video
- Written materials
- Written materials, but no verbal instruction
- None
- Other (please specify)**
Verbal instruction to volunteer participants.

6.2 The system is audited:

- When an employee with access leaves the organization
- If an employee is disciplined for improper use of the system
- Once a week
- Once a month
- Once a year
- Never**
The system will not be audited during this testing process.
- When called for

6.2.1 System auditing is:

- Performed by someone within the organization
- Performed by someone outside the organization
- Overseen by an outside body (for example a city council or other elected body – please specify)
The system will not be audited during this testing process.

6.3 Privacy Impact Analysis:

Given the sensitivity and scope of information collected, what privacy risks related to security were identified and mitigated?

The privacy risk is that an unauthorized user would gain access to the information or that an authorized user would use the information for an unauthorized purpose. To mitigate these risks, all records will be stored on the Alabama Department of Homeland Security's Virtual Alabama server, which is currently secured via a firewall and has very limited access. The images are protected in accordance with Alabama Department of Homeland Security access control procedures. All wireless transmissions of video during the testing (which includes video sent from the CCTV system in the school to the console in the police console center, and transmission from the console to the PDAs of the first responders) will be encrypted.



Section 7.0 – Notice

7.1 Is notice provided to potential subjects of video recording that they are within view of a surveillance camera?

- Signs posted in public areas recorded by video cameras
- Signs in multiple languages
- Attached is a copy of the wording of such notice signs
- Notice is not provided
- Other (please describe)**

All individuals being recorded are volunteers from the Alabama state and local law enforcement and first responder communities who have expressly volunteered to participate in the testing. The video will be limited to images of those volunteers who will understand that their images will be stored and the limited purposes for which those images will be used. If during the test, it appears that individuals other than the consenting volunteers may be on site and could be imaged in the video, signs will be prominently posted notifying everyone in the video field of view that video recording is occurring as part of a testing effort by law enforcement.

Section 8.0 – Technology

The following questions are directed at analyzing the selection process for any technologies used by the video surveillance system, including cameras, lenses, and recording and storage equipment.

8.1 Were competing technologies evaluated to compare their ability to achieve system goals, including privacy protection?

- Yes
- No

SMDC canvassed and evaluated approximately 12 vendors offering similar technologies, after which the selection and evaluation committee selected one vendor to perform the field testing in the schools.

8.2 What design choices were made to enhance privacy?

- The system includes face-blurring technology
- The system includes blocking technology
- The system has other privacy-enhancing technology (Please specify)
- None (Please specify)**

The purpose of this testing is to evaluate the ability of the test technology to transmit high quality images from the schools' CCTV systems to a console in the police call center, and then to PDAs used by law enforcement officials and first responders. for the possible future application of this technology in enhancing school safety. If the technology transmits the images well, it would provide the capability for law enforcement officers and first responders outside the school to assess the status of events inside the school in order to plan and execute the best response and ensure the safety of the students. Blurring or



blocking faces would impair the ability of the Alabama Department of Homeland Security, Alabama state and local law enforcement and first responders, and members of the selection and evaluation committee to evaluate the technologies included in the testing process.

Responsible Officials

Stephen Knox,

Command, Control, and Interoperability Division

S&T Directorate

Approval Signature Page

Original signed and on file with the DHS Privacy Office

Hugo Teufel III

Chief Privacy Officer

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