



128 Dorrance Street, Suite 400
Providence, RI 02903
Phone: (401) 831-7171
Fax: (401) 831-7175
www.riaclu.org
info@riaclu.org

August 21, 2025
SENT VIA EMAIL AND MAIL

The Hon. Brett P. Smiley
Mayor
Providence City Hall
25 Dorrance Street
Providence, RI 02903

Col. Oscar Perez
Chief of Police
Providence Police Department
325 Washington Street
Providence, RI 02903

Dear Mayor Smiley and Chief Perez:

Our organization has followed with interest the city's announcement this past week of the launch of its Real Time Crime Center (RTCC). The RTCC seeks to integrate a wide variety of intrusive surveillance devices – including drones, automated license plate readers, and privately-owned camera feeds – for police use in addressing crime. I am writing to express our deep concerns about the privacy implications of this new system, which we feel have been far from adequately addressed. We ask you, and the City Council, to support not only the department's adoption of strong privacy policies in its implementation of the system, but the codification of those protections into municipal ordinance as well.

Public comments from supporters of the system, including yourselves, have acknowledged and seemed to emphasize the importance of safeguarding personal privacy with the use of such an all-encompassing surveillance system. However, for a number of reasons, those promises of privacy fail to provide much comfort.

First, despite the City's purported concern about protecting privacy, there are, to our knowledge, no formal or publicly available privacy policies currently in place even though the system is already in use. Instead, according to a *Providence Journal* article this week, a policy is "pending and under a final review."¹ It is hard to believe that the City truly considers privacy to be a priority if it implements an invasive surveillance system like the RTCC before having privacy policies firmly in place, and without seeking any advance public input from the community on those policies.

We have seen a copy of the Department's "RTCC Standard Operating Procedures" (SOP), but it possesses no semblance of a meaningful privacy policy. We are therefore unsure if the SOP is the unfinished policy referenced in the *ProJo* article or separate from it. In either

¹ <https://www.providencejournal.com/story/news/crime/2025/08/19/real-time-crime-center-providence-police-taking-virtual-policing-to-the-next-level/85716803007/>

case, its few privacy references fail to confirm the Providence Police Department's stated commitment to "protecting the privacy of the public."

For example, in seeking to downplay the fear of constant surveillance that a system like this suggests, the *ProJo* article quotes Colonel Perez as saying that video monitoring is "reactive" rather than "proactive," and "only accessed when a crime occurs" or if there is a "public safety concern of an incident that has occurred." But the SOP leaves wide open the circumstances when the system can be used, listing not just serious offenses like homicides and robberies, but also undefined "[i]ncidents involving suspicious behavior."² Perhaps even more to the point, the example cited in the news story about the system's recent use involved information generated by the *proactive* use of a police drone to monitor activity at the annual Dominican Festival Rhode Island, a First Amendment-protected event. This does little to alleviate concerns as to whether the RTCC will be used in very limited circumstances.

In a further attempt to assuage the legitimate and understandable privacy fears generated by a surveillance system like this, the SOP states that "all camera usage must be consistent with applicable privacy laws and department policies." The City's news release announcing the launch of the RTCC similarly assures that the center "complies with all local, state and federal laws." The problem, however, is that there are virtually no substantial local, state or federal laws currently in place that provide privacy protections to individuals against this type of quickly growing technological surveillance. The companies in this industry and the police have generally been wildly successful in preventing privacy safeguards from being statutorily implemented, making the current assurances of compliance a largely empty gesture.

The RTCC also seeks to make use of a wide network of *private* cameras, which includes – with the building or homeowner's permission – giving the department direct access to camera feeds from these places. Among our other concerns, it appears that, according to the SOP, any footage downloaded from those cameras by the police department can be retained indefinitely.³

A key element of this comprehensive surveillance system is the inclusion of the city's Flock Safety automated license plate reader (ALPR) system. It is therefore worth highlighting all the privacy concerns that that system alone generates. In correspondence with city officials three years ago when the City first indicated it would be purchasing the ALPR system, we pointed out many of those concerns.⁴ Those fears have only been heightened with recent news reports indicating how Flock Safety has been used by police departments across the country to help with the enforcement of President Trump's deportation policies.⁵ While Providence's ALPR policy may state that it will not be used for immigration purposes, nothing prevents any of the dozens of other police departments that are tied into

² "Real Time Crime Center Standard Operating Procedures," §1.2.

³ "Real Time Crime Center Standard Operating Procedures," §1.8(C).

⁴ https://www.riaclu.org/sites/default/files/field_documents/aclu_of_ri_ppd_flock_policy_commentary.pdf

⁵ <https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows>

Providence's ALPR's system – from both in and out of state – from sharing the City's data themselves with immigration officials or other federal authorities.⁶

In short, we believe that the SOP lacks any major privacy protections and should be significantly revised. At the same time, we firmly believe that administrative policies, as useful as they are, remain an insufficient and incomplete way to protect privacy interests. In our view, the adoption of a formal city ordinance with clear remedies that individuals can obtain for privacy violations is essential in order to truly protect residents from inappropriate and unlawful surveillance through this new system.

History teaches that surveillance tools inevitably engage in mission creep, expanding their role well beyond their initial intent. We therefore ask that, in addition to promptly strengthening departmental policies to prevent misuse of the RTCC, you support the enactment of strong privacy protections via municipal ordinance. By sending a copy of this letter to the members of the City Council, we are asking them to join in promoting municipal legislative safeguards and remedies to address the Orwellian threat that a pervasive surveillance system like the RTCC poses.

The potential dangers of this comprehensive surveillance system are obvious and cannot be overstated. Your public comments about the need for strong privacy safeguards acknowledges this fact. We therefore call on you to take meaningful steps that demonstrate that privacy truly is a priority in implementing this new broad-based surveillance system in the city.

Thank you in advance for considering our views.

Sincerely,



Steven Brown
Executive Director



Madalyn McGunagle
Policy Associate

cc: Providence City Council
June Rose, City Council Chief of Staff

⁶ The privacy implications get even worse. In at least one documented instance, police in Texas used the Flock system to search nationwide for a woman who'd had a self-administered abortion, which was illegal in the state. (<https://www.404media.co/a-texas-cop-searched-license-plate-cameras-nationwide-for-a-woman-who-got-an-abortion>). In addition, Flock recently announced that police departments will soon be able to obtain not just still photos from ALPRs, but also live feeds and video clips of cars passing by the cameras.