Overview of NC GangNET

The North Carolina Governor's Crime Commission (GCC), North Carolina Department of Public Safety (DPS) owns NC GangNET, a gang-tracking software application used for investigative, analytical, and statistical recording and tracking of gang members and associates, gangs, and their activities from jurisdictions across the state. The NC GangNET database supports information sharing about gang members and activities among participating law enforcement agencies and the NC Division of Adult Corrections. NC GangNET and its associated training are offered free of charge to North Carolina qualified participants.

NC GangNET is based on the commercially developed GangNET software utilized by numerous federal, state, and local law enforcement agencies across the United States and Canada. NC GangNET is managed by staff of the Criminal Justice Analysis Center (CJAC) of the GCC and IT support is provided by DPS Information Technology staff members.

NC GangNET provides investigators a supplement to the existing law enforcement agency records management systems by providing a consolidated repository of information on gang members and associates and gang-related activity. NC GangNET allows certified users including law enforcement officers, support personnel, probation and corrections officers to search gang-oriented information in a more efficient and effective manner than is possible in local agency's standard investigative records management systems. For example, a trained and certified officer in a local police department can easily query NC GangNET for a list of members in a specific gang or check to determine if a suspected gang member from another jurisdiction who is operating within the officer's city has been identified in other jurisdictions. It is not currently possible to perform the same sort of query using many local police department's records management systems.

NC GangNET has the capacity to share information with other state and local law enforcement agencies that use the GangNET software via the Washington/Baltimore High Intensity Drug Trafficking Area (W/B HIDTA) program. W/B HIDTA provides a read-only platform that allows participating local, state, and federal GangNET to share interstate gang intelligence. W/B HIDTA participants do not have the capability to edit or change information in NC GangNET. GCC requires access controls for state and local agencies as a prerequisite to gaining access to NC GangNET data. NC GangNET complies with 28 Code of Federal Regulations (C.F.R.) Part 23, a federal regulation governing federally funded multijurisdictional criminal intelligence systems to ensure they are used in conformance with the privacy and constitutional rights of individuals. Under this regulation, a project can only collect and maintain criminal intelligence information concerning an individual if there is reasonable suspicion that the individual is involved in criminal conduct or activity and the information is relevant to that criminal conduct or activity. NC GangNET has established system submission criteria that define which individuals may be recorded in the system. All systems operating under 28 C.F.R. Part 23 have a mandatory maximum retention period of five years after the last date the data is edited.

In accordance with 28 C.F.R. Part 23, an individual must meet criteria established by NC GangNET to be included as either a gang member or gang associate in NC GangNET. For example, an individual that has been convicted of a gang-related offense, has admitted to gang membership, and/or has been identified as a gang member by a jail or prison in which they were confined, could be included as a gang member or associated in the NC GangNET system. NC GangNET data is not used directly as evidence to prosecute crimes. NC GangNET is solely a data repository with limited search and analytical tools that help certified users identify

individuals and organizations that may be involved in gang-related criminal activity. It is incumbent on the investigator that uses NC GangNET to build their case using original data sources which are referenced in NC GangNET and not information within the system alone.

Typical Transaction
During the course of a criminal investigation, a gang investigator encounters an individual (for example, the officer interviews the individual) who meets the North Carolina established criteria for being a gang member. In addition to other recordkeeping activities associated with the investigation (e.g., writing a report of interview for the case file and inputting information into the local agency records management system), the officer may logon to NC GangNET and query the system to determine if the individual already has an NC GangNET record. If no record exists, the officer may create a new record and enter the available identifying information about the individual, such as name, date of birth, physical description, immigration status, suspected gang affiliation, and photograph if available. The officer may also enter notes about his encounter with the individual (i.e., the interview). If the individual already has an NC GangNET record, the agent will review the record to determine if there is any useful information that may assist in his current investigation. In addition to updating any official case records that exist pertaining to the current investigation, he will also update the NC GangNET record with any new information obtained during the interview and will enter notes about the interview itself.

Characterization of the Information
The following 35 questions and responses are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

Juvenile Inclusion
The following questions pertain to the inclusion of information about juvenile gang members, suspects and associates. In North Carolina, juvenile refers to all individuals that are under the age of 16 years. All youths age 15 and under are juveniles and ages 16 and above are considered adult by the state criminal justice system.

Question 1: Are there special rules for the use of information on juveniles in the NC GangNET system?

While there is no specific rule preventing information from being collected about juveniles in a law enforcement intelligence system, there is a rule preventing the use of a photographic image of their face. Photographs of scars, tattoos and other identifying information including biographic information are applicable. This information falls under the same protections of 28 CFR, Part 23 as described in this publication.

Question 2: Why is it important to maintain information on juveniles?

A good example would be when a juvenile matriculates from middle school to high school and the school resource officer (SRO) encounters some problems with a student he does not know. If the SRO suspects this student is gang involved, he/she can query the NC GangNET system to determine if there is any information that might support these worries and help prevent rival clashes or other incidents on campus. As juvenile involvement in gang activities is more

prevalent, to not track juvenile gang involvement would have law enforcement miss the potential of identifying dangerous offenders.

Question 3: What information is collected, used, disseminated, or maintained in the system?

NC GangNET maintains personal information about individuals who qualify as suspected or confirmed gang members and associates under established criteria. NC GangNET stores the following data about each gang member and associate to the extent it is available: biographic information (name, date of birth, etc.), immigration status, gang affiliation, physical description, government-issued identification numbers, photos of the individual, and identities of gang associates, field interview notes, and criminal history information. NC GangNET also stores general comments entered by the certified user(s) that created the gang, individual member or gang associate record as well as a reference to the official evidentiary system of records where any official case files are stored.

NC GangNET maintains more general data on criminal gangs including gang names, various symbols they use, membership levels, and turf claimed. Each subject record in NC GangNET also includes the contact information for the certified user and agency that entered the information into NC GangNET so that they can be contacted, if necessary, by other NC GangNET users. Finally, designated NC GangNET users can quickly generate various reports such as gang rosters or statistical reports on demographics, and link analysis reports that identify commonalities between records in NC GangNET based on user-defined queries and criteria. Statistical reports do not contain any personal information about gang members. These reports are user-generated on an ad hoc basis and are not stored in the system for future use. These reports can be printed.

Question 4: What are the sources of the information in the system?

Law Enforcement agencies in North Carolina obtain information such as statements or seized communications about gang members and/or associates directly from the individual or from other suspects, witnesses, informants, and victims during normal law enforcement investigative activities such as arrest, search, or field interview. Law enforcement officers and support personnel may also collect and input information into NC GangNET from other law enforcement agencies so long as that agency's information satisfies NC GangNET criteria for designating an individual as a gang member or associate. Additionally, information on prison "Security Threat Groups" (STGs) is uploaded from the Division of Adult Corrections as well as information on "Community Threat Groups" (CTGs) from Adult Probation. NC GangNET users also have access to the records of other federal and state organizations that use the GangNET software via its existing connection to the Washington, DC/Baltimore, MD HIDTA.

Question 5: Why is the information being collected, used, disseminated, or maintained?

The NC GangNET database supplements the existing agency records management systems by allowing investigators and support personnel to efficiently search, access, and review gang-related information in support of law enforcement investigations. Currently, many agency records management systems are not designed to consolidate and organize investigative

materials about gang-related activity or to facilitate sharing of gang-related information with other law enforcement agencies. NC GangNET provides a central repository for all certified agencies and officers to use, enter, search and analyze information about gangs, gang activities, and gang members and their associates. The information is also maintained to allow the sharing of gang information with other law enforcement agencies in support of criminal investigations and related activities. At present, NC GangNET only shares information with other states and federal agencies via the Washington/Baltimore HIDTA.

Question 6: How is the information collected?

North Carolina law enforcement officers who have been trained and certified to use NC GangNET collect the information directly from individuals during normal law enforcement investigative activities such as an arrest or field interview, from an informant, or by reviewing documentary evidence such as seized communications. These officers and support personnel also collect information from prisons about gang members in their populations on an ad hoc basis. Before an NC GangNET user creates a new record, the NC GangNET software automatically queries the existing records and allows the user to update an existing subject record rather than creating a new record. This reduces the likelihood of duplicate subject records. Additionally, information on STGs and CTGs (Corrections and Probation classifications of gangs) is bridged from their data into NC GangNET.

Question 7: How will the information be checked for accuracy?

Law enforcement officers and support personnel entering information into the NC GangNET database are trained on the identification and verification of suspected gang members and associates and only enter a subject into the database once the individual has been determined to satisfy the gang member/associate criteria. It is under the discretion of trained Investigators and support personnel to determine whether an individual meets these criteria and is entered into the NC GangNET database. The system administrators may query a sample of NC GangNET records and check them for accuracy by contacting the originating office and verifying the information. Additionally, NC GangNET automatically queries existing records before allowing the user to create a new subject record so there is usually only one record per individual in NC GangNET.

The subject's record may be updated, expanded and corrected any time the subject is encountered by participating agencies and officers, which improves the accuracy of the information. As a safeguard, if NC GangNET data is found to be helpful in the context of a current investigation, officers are required to obtain and verify the original source data from the agency. Source verification coming from the same or another agency, that collected the information, prevents inaccurate information from being relied upon during the investigation and any subsequent trial.

Question 8: Given the amount and type of data collected, what privacy risks were identified and how were they mitigated?

Privacy Risk 1:
NC GangNET may contain records about individuals who are neither gang members nor associates.

Mitigation:
This risk is mitigated by having automatic purge parameters in place which permanently deletes stored personally identifiable information (PII) if that information has not been accessed within five years, in accordance with 28 C.F.R. Part 23. Furthermore, every user of NC GangNET undergoes agency-wide and system-specific training to ensure adherence to all policies pertaining to the system. It is important to note that NC GangNET data is never used directly as evidence to prosecute crimes. NC GangNET contains references to the official evidentiary systems of records, which makes it possible for officers to verify the accuracy of information before taking action based on that information.

NC GangNET is solely a data repository with limited search and analytical tools that help users identify individuals and organizations that may be involved in gang-related criminal activity. It is incumbent upon the investigator who uses NC GangNET to fully check all original data sources. As a safeguard, when investigating potential violations of state and/or federal laws users are required to obtain and verify the original source data from the agency that collected the information to prevent inaccurate information from propagating.

Privacy Risk 2:
There is also a risk that NC GangNET collects more information than necessary for the purpose of the system.

Mitigation:
For NC GangNET to be effective, it must contain as many details on gangs and gang members and associates as possible so that users can search the database for the individuals or organizations they are researching. Systems used for law enforcement purposes typically require more information than non-law enforcement systems to serve their purpose. This risk is mitigated by the limited retention period (five years from the date of last recorded activity) for information about individuals. Also, only certified users with a "right" and/or a "need" to know information contained in the NC GangNET system my query its data.

Uses of the Information
The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

Question 9: Describe all the uses of information.

With through information entered, the system users may search the database for individuals with more accuracy. North Carolina law enforcement use NC GangNET for various purposes in connection with criminal investigations and other law enforcement activities. For example, an officer may search NC GangNET to determine whether an individual who is the subject of an ongoing criminal investigation is associated with gang activity. Such information may reveal to the officer a connection between the crimes being investigated and gang activity, which could help refocus the investigation. The officer may also use NC GangNET to identify the individual's known gang associates or fellow gang members who may be witnesses, suspects, or accomplices to the crimes being investigated.

NC GangNET users are also able to see the other personnel who encountered the NC GangNET subject, which may facilitate information sharing pertaining to the investigation or prosecution of a particular individual or case. NC GangNET also electronically shares gang

information between other states and federal agencies through reciprocally connected GangNET software of the Washington/Baltimore HIDTA. Via their own GangNET systems, out of state and federal law enforcement users can query and obtain read-only access to the data in NC GangNET. North Carolina users can also access out of state and federal information in the same way by querying the Washington/Baltimore HIDTA network of state and federal GangNET system.

Certified North Carolina participants may use NC GangNET to produce statistical reports on gang activities for various law enforcement, management, and reporting purposes. NC GangNET also allows users to conduct link analysis among the various records to identify individuals that may be connected by an attribute such as an address or an associate. These connections and associations may provide leads for investigators to follow in pending investigations.

NC GangNET users can also quickly generate gang rosters identifying all members of a particular gang. NC GangNET data is never used directly as evidence to prosecute crimes. NC GangNET is solely a data repository with limited search and analytical tools that help NC GangNET users identify individuals and organizations that may be involved in gang-related criminal activity. It is incumbent on the investigator that uses NC GangNET to fully check all original data sources.

Question 10: What types of tools are used to analyze data and what type of data may be produced?

NC GangNET has a query interface called "Find Subject" which provides users the capability to search over 50 unique field types against NC GangNET subject records. For example, a list can be generated searching all subjects with a tattoo on the front side of their left leg. Additionally, NC GangNET includes many standardized statistical reports that provide aggregate counts based on the report type. These reports are pre-programmed and require a user to supply basic criteria such as age, gender, or ethnic background. The ad-hoc query reports allow users to create and save custom query templates that are not already included in NC GangNET. Users can construct their own reports using any information contained in the database. These reports are built using standard structured query language (SQL).

Question 11: If the system uses commercial or publicly available data please explain why and how it is used.

NC GangNET users that collect information about a gang member or associate in the course of an investigation or other law enforcement activity may obtain some of that information from commercial or publicly available data sources. That information may ultimately be entered into NC GangNET when the gang member or associate record is created or updated by the certified agency user. The officer is responsible for ensuring that the public or commercial data is accurate to the extent possible before including it in NC GangNET.

Question 12: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

Automatic purge parameters permanently delete stored personally identifiable information if that information has not been edited within five years, in accordance with 28 C.F.R. Part23. Additionally, NC GangNET users undergo agency-wide and system-specific training. Only GCC employees and contractors are able to directly access the NC GangNET system. Further, individual users cannot access NC GangNET without an account created for them by the system administrators. Users of the W/B HIDTA system can query and have read-only access to NC GangNET gang data, but do not have direct user access or edit privileges to NC GangNET.

Retention

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

Question 13: What information is retained?

NC GangNET records containing gang members' and associates' personal identifying information are retained. General information in NC GangNET that does not necessarily pertain to a specific individual (such as estimated membership size, claimed turf, common signs, symbols etc.) is also retained. NC GangNET does not store reports or link analyses or other ad hoc reports run by certified users for later review. They must be printed out in hard copy to be retained.

Question 14: How long is information retained?

The gang member and associates records are stored in the system for five years after the last date they were updated, as required under 28 C.F.R. Part 23. Records are automatically tagged when they are accessed with the expected purge date, allowing administrators to purge expired data automatically and efficiently.

Question 15: What are the risks associated with the length of time data is retained and how are those risks mitigated?

Privacy Risk: Retaining NC GangNET data longer than necessary would violate the Fair Information Principle of minimization which requires systems and programs to retain only the information necessary and relevant to complete the task associated with its initial collection.

Mitigation: The five year period suggested for NC GangNET complements the mission requirements of NC GangNET because five years allows for sufficient time to analyze and track suspected gang members and associates, and allows for a fuller development of complicated cases where linkages between subjects, organizations, and criminal conspiracies are difficult to detect. It is also sufficiently short to reduce the risk of out-of-date information persisting indefinitely. Understanding that the retention period should not be longer than the mission and purpose of the system, five years ensures that certified participants can use the information for the stated purpose while not keeping the information longer than necessary. It should be noted that the retention period is established by 28 C.F.R. Part 23 and all users of the GangNET systems (such as W/B HIDTA) must also comply with this retention period.

Internal Sharing and Disclosure
The following questions are intended to define the scope of sharing within and between North Carolina certified law enforcement and correctional agencies.

Question 16: With which law enforcement and correctional organization(s) is the information shared, what information is shared and for what purpose?

In certain cases, select individuals in the Division of Adult Correction or probation and parole officers who have a specific need for access may be given access to the system through user accounts on a case-by-case basis. These users are provided read-only access and cannot modify NC GangNET records directly. Local, state (SBI, ALE, Highway Patrol), federal (ATF, ICE, FBI) and other certified law enforcement agencies are afforded system privileges.

Question 17: How is the information transmitted or disclosed?

Information is transmitted and shared by directly accessing NC GangNET via a secure internet connection. W/B HIDTA users have access to the same functions and tools that most NC GangNET users have. However, users outside of North Carolina via the W/B HIDTA are limited to read-only access which prevents them from adding, modifying, or printing data.

Question 18: Considering the extent of internal information sharing, what privacy risks are associated with the sharing and how were they mitigated?

Privacy Risk: A risk exists that information may be shared with other criminal justice components without a need to know.

Mitigation: Information from NC GangNET is shared only with law enforcement organizations that have a role in the investigation of possible violations with criminal laws. NC GangNET uses access controls and audit trails to mitigate the risk information will be accessed by unauthorized individuals or improperly used by authorized individuals. Out-of-state system users of NC GangNET via W/B HIDTA currently have read-only access, which mitigates the risk that they will modify the data.

All NC GangNET agencies and users must sign use agreements and undergo mandatory system-specific training which helps ensure that NC GangNET data is not shared inappropriately.

External Sharing and Disclosure
The following questions are intended to define the content, scope, and authority for information sharing external to NC GangNET certified users, which includes federal, state and local government, and other partners via W/B HIDTA.

Question 19: With which external organization(s) is the information shared, what information is shared, and for what purpose?

NC GangNET shares information with the Washington/Baltimore HIDTA system and its collaborative users for the purpose of providing information on gangs, gang members and gang associates to the wider law enforcement community.

NC GangNET and W/B HIDTA member users are able to reciprocally query and access data in each other's repository. Users of each system have read-only access to the data in the other system and are unable to change, save or print the information.

Question 20: Is the sharing of personally identifiable information outside the State compatible with the original collection?

Sharing with external law enforcement agencies is compatible with the purpose of the original collection, namely to improve the efficiency and effectiveness of law enforcement personnel investigating gang members and associates and gang-related activity and to facilitate sharing of gang-related information. NC GangNET information shared with W/B HIDTA users is done so pursuant to an existing information sharing agreement. As the community of W/B HIDTA participants grows, additional sharing partners may be identified and give NC GangNET users access to their data and may be given access to NC GangNET data.

Question 21: How is the information shared outside the state and what security measures safeguard its transmission?

A secure Internet connection protects the data as it flows between NC GangNET and W/B HIDTA. Users of NC GangNET and W/B HIDTA access each other's data transparently via their own GangNET application. Memos of Understanding (MOUs) are signed between the HIDTA and all participants designating organizational security and responsibilities between all connected parties for protection and handling of all view-only access

Question 22: Given the external sharing, what privacy risks have been identified and how were they mitigated?

Privacy Risk:
The primary risk that results from sharing NC GangNET information with W/B HIDTA participants is HIDTA users can use NC GangNET data for purposes besides the investigation of gangs and gang-related activity.

Mitigation:
External users of reciprocally supported GangNET software suites are trained, granted access, and monitored by their host agency but with training, policies and monitoring which is similar and complimentary to NC GangNET policy. Further, HIDTA users are limited to read-only access to NC GangNET and cannot edit, print or save viewed information.

Notice
The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

Question 23: Was notice provided to the individual prior to collection of information?

All information collected about gangs and their members and associates is law enforcement sensitive and notice is not given to the subject that a record is being created in NC GangNET. In some cases, the subject knows law enforcement is gathering information about him/her (such as information given at the time of booking or during interviews). In lieu of individual notice, this publication acts as notice to the public that the NC GangNET system exists and that it collects information regarding gang members and associates.

Question 24: Do individuals have the opportunity and/or right to decline to provide information?

In most cases, because of the law enforcement purposes for which the information is collected, opportunities to decline may be limited or nonexistent.

Question 25: Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

In most cases, because of the law enforcement purposes for which the information is collected, individuals do not have a right to consent to particular uses of the information. The information in NC GangNET will be used in accordance with rules and laws affecting the use of law enforcement intelligence data.

Question 26: How is notice provided to individuals, and how are the risks associated with individuals being unaware of the collection mitigated?

Most directly, the public is provided notice of the NC GangNET system through this publication. As part of the NC GangNET administrative and auditing process, applicable laws have been reviewed to ensure that NC GangNET is used appropriately given the notice provided. Further, because NC GangNET is a system where many law enforcement contexts apply, notice or the opportunity to consent to use would compromise the ability of law enforcement agencies to perform their missions and could put law enforcement officers at risk.

Access, Redress and Correction
The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

Question 27: What are the procedures that allow individuals to gain access to their information?

Individuals may request access to records from the GangNET user or agency they suspect may have entered data by following the procedures of that agency. NO PRINTED MATERIAL WILL BE PROVIDED. All or some of the requested information may be exempt from access pursuant to the Privacy Act in order to prevent harm to law enforcement investigations or interests.

Providing individual access to records contained in NC GangNET could inform the subject of an actual or potential criminal, civil, or regulatory violation investigation or reveal investigative interest on the part of that agency or another agency. Access to the records could also permit the individual who is the subject of a record to impede the investigation, to tamper with witnesses or evidence, and to avoid detection or apprehension. The limit of information may simply be the verbal confirmation that a subject is in the system and nothing else.

Question 28: What are the privacy risks and what redress is available to individuals and how are those risks are mitigated?

Privacy Risk: There is a risk that an individual's record may be inaccurate and/or out-of-date.

Mitigation: NC GangNET data is never used directly as evidence to prosecute crimes. NC GangNET is solely a data repository with limited search and analytical tools that help users identify individuals and organizations that may be involved in gang-related criminal activity. It is incumbent on the investigator that uses NC GangNET to fully check all original data sources (i.e., those agencies or officers who originally entered the information into NC GangNET). As a safeguard, when investigating potential violations of state and/or federal laws investigators are required to obtain and verify the original source data from the agency that collected the information to prevent inaccurate information from propagating. There is also a limited retention period for these records, and quality review checks that are performed to identify and correct records. These protections mitigate the risks posed to any individuals whose data may be in NC GangNET.

Technical Access and Security
The following questions are intended to describe technical safeguards and security measures.

Question 29: What procedures are in place to determine which users may access the system and are they documented?

NC GangNET administrative management is responsible for ensuring that all personnel granted direct access to NC GangNET are appropriately trained and monitored. This is done by working with the NC GangNET administrator to establish user accounts, update user identification, role and access profiles as changes are needed. All users requesting access must be approved through the submission of both an agency and user agreement to the NC GangNET administrators. All sworn law enforcement agencies and officers are eligible for an NC GangNET account. Some non-agents, such as
Law enforcement agency crime analysts that work on gang-related issues, have accounts as well.   Other groups have access, including probation officers and correctional security threat group officers. Users, who access NC GangNET information from external GangNET portals, such as W/B HIDTA, are granted access through their host agency and do not have NC GangNET user accounts. All GangNET software packages with access to NC GangNET will have audit trails or access controls allowing for the tracking of information access. Each GangNET host agency is responsible for maintaining user accounts and ensuring compliance with applicable policies.

There are three access control roles that NC GangNET users might be assigned. Generally, agency designated users have "read/write" access so as to allow them to search and update the

NC GangNET database and run ad hoc reports. The majority of users (currently 81.5%) have a limited "read-only" account that allows them to search NC GangNET data, but not edit it. This role is used to ensure that individuals, such as some analysts, who do not need to edit the data, won't intentionally or inadvertently alter the NC GangNET data. Finally, administrators have full read and write access and the capacity to configure various parameters of the application. When NC GangNET access is given to W/B HIDTA participant agents, they have read-only access and cannot modify NC GangNET records.

Question 30: Will Department contractors have access to the system?

Contractors, including developers and information technology operations and maintenance staff from SRA International, have administrative access to NC GangNET for the purpose of maintaining and upgrading the system. SRA International developers and IT staff of NC DPS are the only non-law enforcement or non-NC GangNET administrative individuals with access. NC DPS IT support staff do not have user accounts but do maintain the technical operation of the hardware and database.

Question 31: What privacy training is provided to users either generally or specifically relevant to the program or system?

All certified NC GangNET system users must sign a rules of behavior MOU agreement prior to training, which includes protecting sensitive information from disclosure to unauthorized individuals or groups.

Training of a course of instruction that addresses, at a minimum:
1. The definition of a criminal street gang.
2. Accepted criteria for identifying gang members, associates, and entry of photographs.
3. Criminal predicate/reasonable suspicion definitions.
4. Federal, state and local law statutes and policies regarding criminal intelligence information.
5. Responsibilities related to, and utilization of both the NC GangNET and W/B HIDTA systems.

Question 32: What auditing measures and technical safeguards are in place to prevent misuse of NC GangNET data?

Activities including subject name searches, vehicle, address, gang name, case number and contact number searches are audited. The enhanced auditing captures what new data was entered, what data existed before and after modification, and what data was deleted. In order to print from the system, a user is required to enter the purpose/reason. To comply with 28 C.F.R. Part 23, when a record is purged, all data related to that record is also purged including any audit records (i.e. the fact the record ever existed in the NC GangNET system has to be expunged). Security measures in place include ensuring access is only granted to authorized users and is password protected and user accounts are created on an individual basis to further secure user information.

Question 33: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Privacy Risk: There is a risk that personally identifiable information in NC GangNET will be accessed inappropriately.

Mitigation: This risk is mitigated by security training including protecting sensitive information and by the use of audit mechanisms logging and monitoring user activity. The assignment of roles to users establishing their access levels based on agency input and training certifications and regular review of those roles along with system audit trails mitigates the risk that users will be able to access information inappropriately.

Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware.

Question 34: What is a gang intelligence system?

The NC GangNET database is a web-based commercial software tool that allows data entry and data sharing between certified law enforcement agencies. It enhances the North Carolinas law enforcement capability to identify and investigate crimes by gang members and associates and other illegal gang-related activity.

Question 35: Does the system employ technology which may raise privacy concerns?
No.

Much of the information in this document was adapted from the Department of Homeland Security ICE Gang Privacy Impact Report.