

September 10, 2021

## MEMORANDUM

**To:** Transportation and Utilities Committee  
**From:** Lise Kaye, Analyst  
**Subject:** Council Bill 120171 - Authorizing approval of uses and accepting the Surveillance Impact Reports for the Seattle Fire Department's use of Emergency Scene Cameras and Hazardous Materials Cameras

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On September 15, 2021, the Transportation and Utilities Committee will discuss CB 120171. The bill is intended to meet the requirements of [Seattle Municipal Code Chapter 14.18](#), Acquisition and Use of Surveillance Technologies.<sup>1</sup> CB 120171 would approve the Seattle Fire Department's (SFD's) continued use of two types of cameras:

1. Emergency Scene Cameras, and
2. Hazardous Materials Cameras

Passage of the bill would also accept the Surveillance Impact Reports (SIRs) and Executive Overviews for each of these technologies, as further detailed in this memo. Each Executive Overview summarizes the operational policy statements which represent SFD's allowable uses of each type of Camera and the data collected thereby. SFD anticipates that additional, and potentially more detailed, policies regarding access and other protocols will be considered in the next round of labor negotiations.<sup>2</sup>

This memo describes the purpose and use of the Emergency Scene Cameras and Hazardous Materials Cameras and summarizes SFD's applicable operating policies and guidelines, potential civil liberties impacts, potential disparate impacts on historically targeted communities and vulnerable populations, and the public engagement process, as reported in each SIR. It also summarizes recommendations pertaining to each SIR from the Community Surveillance Working Group's Impact Assessment. Finally, the memo identifies policy issues associated with each technology for Council consideration.

### **Purpose and Use**

#### Emergency Scene Cameras

SFD uses Emergency Scene Cameras to provide images of trauma patients to emergency medical doctors, capture fire scene images for Fire Investigation Unit investigations, and/or as part of safety investigations following collisions involving Department response vehicles. SFD may share Fire Investigation Unit photos with the Seattle Police Department (SPD) and may also share photos taken for vehicle collision investigations with the City's Risk Management Division. Fire Investigation Unit (FIU) photos are stored in a CJIS-compliant database in a secured room of the

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<sup>1</sup> (Ord. [125679](#), § 1, 2018; Ord. [125376](#), § 2, 2017.) Attachment 1 to this memo summarizes these requirements and process by which the Executive develops the required Surveillance Impact Reports (SIRs))

<sup>2</sup> The current contract with Local 27 expires 12/31/2021; a new contract is not likely before mid-2023.

Fire Prevention Division, with limited access.<sup>3</sup> Photos from collision investigations are stored on the Department's server and accessible only to the Safety Office. SFD plans to adopt Multi Factor Authentication in late 2021, to further increase the security of any images stored on City drives. SFD does not currently have auditing measures in place for this technology. The department intends to develop a policy on disclosure, tracking and retention of Unit 77 records and incorporate it into the SFD's Policies and Operating Guidelines (POG) following negotiations with labor partners.

### Hazardous Materials Cameras

SFD uses cameras in two iPads together with an encrypted video conferencing application to help detect and identify potentially hazardous materials or contaminants while maintaining a safe distance from potential exposure.<sup>4</sup> If the SFD Incident Commander determines that a video should be shared with law enforcement for investigation and potential litigation, the Hazardous Materials Unit may share data with SPD's Arson & Bomb Squad (ABS) and Narcotics Unit and the Seattle branch of the Federal Bureau of Investigation (FBI). Photos from Hazardous Materials responses are stored on a secured city drive and are only accessible to members of the Hazardous Materials unit. Any new records retention and data sharing policies would have to be included in the next round of collective bargaining prior to being adopted as Department policy. SFD does not currently have auditing measures in place for this technology. The department intends to develop additional policies on disclosure, tracking and retention of Unit 77 records, as well as the acceptable use of this technology during emergency responses, to be incorporated into SFD's Policies and Operating Guidelines (POG) following negotiations with labor partners.

### **Operating Policies and Guidelines**

CB 120171 would approve the SFD's continued use of Emergency Scene Cameras and Hazardous Materials Cameras and accept the SIRs and Executive Overviews pertaining to each type of camera. Each SIR explains that SFD's current Operating Policies and Guidelines (Appendix I in each SIR) do not specifically address the use of these cameras for issues such as photo retention and data sharing, beyond requirements associated with photos of traumatic injuries.<sup>5</sup> SFD staff have communicated that more detailed operational policies will be discussed in the next round of labor negotiations, following expiration of the current contract on December 31, 2021. If the more detailed policies change the purpose for or manner in which the cameras may be used, SFD will need to submit a revised SIR for Council approval.<sup>6</sup>

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<sup>3</sup> The records are accessible only to fire investigators, the FIU Captain and one civilian administrative specialist.

<sup>4</sup> Using Apple's encrypted Facetime video conferencing application, the cameras livestream video via Apple TV and a mobile router to a television monitor located in SFD's Hazardous Materials Unit.

<sup>5</sup> SFD originally published the draft SIR for these technologies in October 2018. At that time, Appendix I to the SIR consisted of a memo entitled "Dispatch No. -18" outlining draft policies guiding the use of department-issued digital cameras beyond the previous limited requirements related only to photos of traumatic injuries. Since then, the draft dispatch has been superseded by updated Policies and Guidelines, revised November 23, 2020. Prior to Council introduction, SFD updated Appendix I to consist of the November 2020 Policies and Operating Guidelines, which are currently in effect.

<sup>6</sup> Per [SMC 14.18.020](#), "Any material update to an SIR, such as to change the purpose or manner in which a surveillance technology may be used, shall be by ordinance; non-material updates may be made to the SIR by a department without Council action so long as the change is clearly marked as such in the SIR."

The City complies with the State’s Records Retention Schedules ([Disposition Authority GS50 19 03](#)) and has filed retention schedules with the Washington Secretary of State for Fire Operations, Fire Prevention and Risk Management (the latter applies to collisions involving city vehicles).<sup>7</sup> SFD complies with [The Uniform Health Care Information Act \(RCW 70.02\)](#) for the use, retention and disclosure of confidential medical information, including photos of traumatic injuries. SFD may only share photos of trauma patients in person with emergency room staff and must then delete the photos. SFD also complies with federal [Criminal Justice Information Services \(CJIS\) standards](#) for data access and dissemination.

### **Civil Liberties and Potential Disparate Impacts on Historically Marginalized Communities**

Departments submitting a SIR complete an adapted version of the Racial Equity Toolkit (RET) to highlight and mitigate impacts on racial equity from the use of the technology.

#### Emergency Scene Cameras

The RET for the SFD’s use of Emergency Scene Cameras identifies potential civil liberties impacts including identification of personally identifiable information that could identify individuals, including those who have been victims of criminal activity associated with fire investigations, and the need to protect medical privacy. SFD would address these impacts through its existing and pending new policies. In addition, responses to Section 5.0 of the SIR (Evaluate, Raise Racial Awareness, Be Accountable) will be compiled and analyzed as part of the CTO’s Annual Report on Equitable Use of Surveillance Technology.<sup>8</sup>

#### Hazardous Materials Cameras

The single difference between the Emergency Scene Cameras RET and the RET for SFD’s use of Hazardous Materials Cameras is that the latter also noted the potential identification of personally identifiable information that could identify individuals who have been victims of criminal activity.

### **Public Engagement**

The Executive accepted public comments on these technologies from October 8 – November 5, 2018. Very few comments (one or two per question) directly addressed either the Emergency Scene Cameras or the Hazardous Materials Cameras. Comments included a request for a more rigorous process to ensure that trauma photos are deleted after sharing with hospital personnel, support for the technology, and a suggestion that the SFD’s Policies and Operating Guidelines be

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<sup>7</sup> SFD retains Fire Investigation Database records, including fire incident progress images, for 3 years; SFD retains photographic materials from non-arson fire investigation cases for 6 years; SFD retains digital photos and videos from fire investigation cases with no fatalities for 10 years; and SFD permanently retains digital photos and videos from fire investigation cases with fatalities. FAS Risk Management retains vehicle accident reports involving city vehicles for 3 years and 60 days. SFD retains Hazardous Materials Unit records for 50 years. *Sources: Fire and Emergency Medical Records Retention Schedule, Consultation Draft, August 2020. City of Seattle Public Records Retention Schedule and Destruction Authorization forms submitted to the Washington Secretary of State (Fire Operations, 9/20/2003; Fire Prevention, 6/16/2003; Risk Management, March 29, 2002)*

<sup>8</sup> [SMC 14.18.050B](#) requires that the CTO produce and submit to the City Council a Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report that addresses whether Chapter 14.18 of the SMC is effectively meeting the goals of the Race and Social Justice Initiative.

updated by a date certain. Additionally, two organizations submitted letters that included comments on the Emergency Scene and Hazardous Materials Cameras; the American Civil Liberties Union (ACLU), the comments from which track closely with the Community Surveillance Working Group's (SWG's) Impact Assessment, and DENSHŌ, which was generally supportive of the cameras but cautioned against the possibility that it could be used beyond the scope of the stated purposes and the potential use of camera data together with facial recognition technology.

### **Privacy and Civil Liberties Impact Assessment**

The Impact Assessment prepared by the SWG addressed three technologies: Emergency Scene Cameras, Hazardous Materials Cameras, and Seattle Department of Transportation's Closed Circuit Televisions<sup>9</sup>. The Assessment focused on three "key issues": the use of the systems and the data collected by them for purposes other than those intended; over-collection and over-retention of data; and, sharing of that data with third parties (such as federal law enforcement agencies). The Impact Assessment recommended that Council should adopt, via ordinance, "clear and enforceable rules that ensure, at a minimum, the following:

1. The purposes of camera use should be clearly defined, and its operation and data collected should be explicitly restricted to those purposes only.
2. Data retention should be limited to the time needed to effectuate the purpose defined.
3. Data sharing with third parties should be limited to those held to the same restrictions.
4. Clear policies should govern operation, and all operators of the cameras should be trained in those policies."

The Impact Assessment noted that SFD did not have a policy governing the use of these technologies, with the exception of use for injury-related recordings. It also noted that, as of April 5, 2019, SFD had not adopted the policy regarding the use of Department-issued digital cameras that had been added as Appendix I to the updated January 2019 SIR.

### Emergency Scene Cameras

In addition to the four enforceable rule recommendations, the Impact Assessment made the following additional recommendations (#5 – #10) specific to Emergency Scene Cameras (numbering of recommendations added to provide continuity with Table 1, below):

5. SFD should adopt a policy that explicitly states that the term "Department-issued digital camera" applies to both "ESCs" (Emergency Scene Cameras) and "Hazmat" Cameras.
6. SFD's adopted policy should include clear statements of what can and cannot be photographed depending on the situation, including specific protections for the privacy of individuals and homes.
7. SFD's adopted policy should include clear data retention policies, including where and how the data is stored, with all photos immediately deleted once their intended purpose is fulfilled. The policy should explicitly define under what specific circumstances photos are permitted to be transferred off the cameras (e.g., via a SD card, USB cable, or WiFi).

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<sup>9</sup> Council accepted the SIR for SDOT's CCTVs through adoption of Ordinance 125936 on October 4, 2019.

8. In instances where a legal standard such as reasonable suspicion is applied [in use or retention] it should be clear what the standard is, who applies it, and how that application is documented.
9. The policy should explicitly ban sharing of camera data with third parties except for specified instances necessary to fulfill the purpose of the cameras, and only in instances where the third party is held to the same use and retention standards.
10. This requirement [that all camera operators are trained in the foregoing policies] should be part of any new policy.

#### Hazardous Materials Cameras

The Impact Assessment's comments on Hazardous Materials Cameras recommended that SFD adopt a policy that includes all the elements recommended above (items #1 - #10) but limiting use of the Hazardous Materials Cameras to hazardous materials documentation and enforcement. The Assessment also made recommendation #11, specific to Hazardous Materials Cameras:

11. Any Memoranda of Agreement and SFD's policy should limit sharing of data from the Hazardous Materials Camera to criminal hazardous materials enforcement and only where the third party is held to the same use and retention standards as SFD.

#### Working Group Recommendations addressed in the SIRs

Table 1 summarizes whether and how the SIR addresses these recommendations, several of which overlap as noted. Areas not fully addressed are included in the "Policy Considerations" section of this memo.

Table 1. Working Group Recommendations addressed in the Emergency Scene Cameras and Hazardous Materials Cameras Surveillance Impact Reports

Working Group Recommendation	Whether/How Addressed in the SIR	
	Emergency Scene Cameras	Hazardous Materials Cameras
1. The purposes of camera use should be clearly defined, and its operation and data collected should be explicitly restricted to those purposes only.	<p><b>Executive Overview.</b> Operational Policies represent the only allowable uses of the equipment and data collected by this technology.</p> <p><i>See Policy Consideration 1 and, alternatively, other Policy Considerations noted below.</i></p>	<p><b>Same as Emergency Scene Cameras</b></p>
2. Data retention should be limited to the time needed to effectuate the purpose defined. [overlaps with recommendation #7]	<p><b>3.3 Operating Guideline (OG) 5001-13</b> requires that photos that record the “mechanism of injury” be promptly deleted from the camera’s internal memory after they have been shown to hospital emergency department staff. SFD’s Policy and Operating Guidelines do not specifically address retention of other photos or videos taken with emergency scene cameras. SFD anticipates addressing this during the next round of labor negotiations.</p> <p><i>See Policy Consideration 2.</i></p>	<p><b>Same as Emergency Scene Cameras</b></p>

Working Group Recommendation	Whether/How Addressed in the SIR	
	Emergency Scene Cameras	Hazardous Materials Cameras
3. Data sharing with third parties should be limited to those held to the same restrictions. [overlaps with recommendations #8, #9 and #11]	<b>3.3 and 6.1</b> Photos of trauma injuries are shared with emergency room staff and then deleted. Photos for vehicle collision investigations may be shared with FAS Risk Management. <sup>10</sup> Photos of Fire Investigations are shared with SPD. <sup>11</sup>	<b>3.3</b> Photos of trauma injuries are shared with emergency room staff and then deleted. <b>4.8, 6.1 and 6.4</b> SFD is working to develop a policy for the Hazardous Materials unit regarding sharing with law enforcement agencies. <i>See Policy Consideration 3</i>
4. Clear policies should govern operation, and all operators of the cameras should be trained in those policies. [overlaps with recommendation #10]	<b>3.3</b> All SFD uniformed personnel are trained extensively on all POG sections during recruit school and their one-year probationary period following the hire date. Paramedics are trained on the use of cameras for documenting traumatic injuries. <i>See Policy Consideration 4.</i>	<b>7.2</b> No privacy training specifically regarding the use of this technology has been provided to Unit 77 [Hazardous Materials Unit] personnel. Training for users will be included in updated policies discussed during upcoming labor negotiations. <i>See Policy Consideration 4.</i>
5. SFD should adopt a policy that explicitly states that the term “Department-issued digital camera” applies to both “ESCs” (Emergency Scene Cameras) and “Hazmat” Cameras.	SFD’s Policy and Operating Guidelines address Hazardous Materials operations separately from the Department-issued Digital Cameras section.	<b>Same as Emergency Scene Cameras</b>

<sup>10</sup> SFD retains Fire Investigation Database records, including fire incident progress images, for 3 years; SFD retains photographic materials from non-arson fire investigation cases for 6 years; SFD retains digital photos and videos from fire investigation cases with no fatalities for 10 years; and SFD permanently retains digital photos and videos from fire investigation cases with fatalities. FAS Risk Management retains vehicle accident reports involving city vehicles for 3 years and 60 days. *Sources: Fire and Emergency Medical Records Retention Schedule, Consultation Draft, August 2020. City of Seattle Public Records Retention Schedule and Destruction Authorization forms submitted to the Washington Secretary of State (Fire Operations, 9/20/2003; Fire Prevention, 6/16/2003; Risk Management, March 29, 2002)*

<sup>11</sup> Law enforcement records retention varies by nature of the case files. See Section 8.1 Case Management in [Washington State’s Law Enforcement Records Retention Schedule](#).

Working Group Recommendation	Whether/How Addressed in the SIR	
	Emergency Scene Cameras	Hazardous Materials Cameras
6. SFD’s adopted policy should include clear statements of what can and cannot be photographed depending on the situation, including specific protections for the privacy of individuals and homes.	<p><b>3.3</b> Medic One paramedics are trained on the use of cameras for documenting traumatic injuries during paramedic training school. Otherwise, SFD has no policies specifically regarding the use of department-issued digital cameras.</p> <p><i>See Policy Consideration 4.</i></p>	<p><b>7.2</b> Unit 77 (the Hazardous Materials Unit) guidelines describe the best practice use of this technology during an incident response. Training for users will be included in an updated policy to be considered in upcoming labor negotiations.</p> <p><i>See Policy Consideration 4.</i></p>
7. SFD’s adopted policy should include clear data retention policies, including where and how the data is stored, with all photos immediately deleted once their intended purpose is fulfilled. The policy should explicitly define under what specific circumstances photos are permitted to be transferred off the cameras (e.g., via a SD card, USB cable, or WiFi). [overlaps with recommendation #2]	<p>See #2 above regarding data storage and retention. SFD’s Policy and Operating Guidelines do not address the circumstances in which photos may be transferred from the Emergency Scene Cameras.</p> <p><i>See Policy Consideration 2.</i></p>	<p><b>Same.</b> SFD’s Policy and Operating Guidelines do not address the circumstances in which photos may be transferred from the Hazardous Materials Cameras.</p> <p><i>See Policy Consideration 2.</i></p>
8. In instances where a legal standard such as reasonable suspicion is applied [in use or retention] it should be clear what the standard is, who applies it, and how that application is documented.	<p>SFD’s Policy and Operating Guidelines do not set a legal standard for the use of photos or videos produced using Emergency Scene Cameras.</p> <p><i>See Policy Consideration 3.</i></p>	<p>SFD’s Policy and Operating Guidelines do not set a legal standard for the use of photos or videos produced using Hazardous Materials Cameras.</p> <p><i>See Policy Consideration 3.</i></p>
9. The policy should explicitly ban sharing of camera data with third parties except for specified instances necessary to fulfill the purpose of the cameras, and only in instances where the third party is held to the same use and retention standards. [overlaps with recommendation #3]	<p>See #3 above</p>	<p><b>Same as Emergency Scene Cameras</b></p>



Working Group Recommendation	Whether/How Addressed in the SIR	
	Emergency Scene Cameras	Hazardous Materials Cameras
10. This requirement [that all camera operators are trained in the foregoing policies] should be part of any new policy. [overlaps with recommendation 4]	<p><b>3.3</b> All SFD uniformed personnel are trained on all POG sections during recruit school and their one-year probationary period.</p> <p><i>See Policy Consideration 4.</i></p>	<p><b>7.2</b> Unit 77 (the Hazardous Materials Unit) guidelines describe the best practice use of this technology during an incident response. Training for users will be included in an updated policy following negotiations with labor partners.</p> <p><i>See Policy Consideration 4.</i></p>
11. Memoranda of Agreement and SPD's policy should limit sharing of data from the Hazardous Materials Camera to criminal hazardous materials enforcement and only where the third party is held to the same use and retention standards as SFD.	<b>N/A</b>	<p><b>4.8, 6.1 and 6.4</b> SFD is working to develop a policy for the Hazardous Materials unit regarding sharing with law enforcement agencies.</p> <p><i>See Policy Consideration 3.</i></p>

## Policy Considerations

Central Staff has identified the following potential policy considerations. *Please note that Option 1B is an alternative to Options 2-5, as it encompasses the same issues.*

1. Comprehensive policies governing the use and operation of Emergency Scene Cameras and Hazardous Materials Cameras are still in process.

SFD's current Policy and Operating Guidelines do not address some elements pertaining to the use of Emergency Scene and Hazardous Materials Cameras or retention of photos taken with those cameras, other than traumatic injury photos. SFD management anticipates that more comprehensive guidelines will be incorporated into the SFD's Policies and Operating Guidelines following negotiations with labor partners.

Options:

- A. Approve the SIR as drafted.
- B. Amend CB 120171 to require SFD to submit revised SIRs to the Clerk within 30 days after the conclusion of SFD's next labor negotiations. The revised SIRs must include additional policies and/or guidelines governing the use and operation of Emergency Scene Cameras and Hazardous Materials Cameras, including measures to protect for the privacy of individuals and homes, record retention schedules, protocols for data sharing with law enforcement and training.
- C. Take no action.

2. SFD's Policy and Operating Guidelines do not currently define the circumstances in which photos and videos may be transferred from the Emergency Scene and Hazardous Materials Cameras and do not reference SFD's retention schedules.

Unless granted an exception, SFD must be consistent with Washington State's Fire and Emergency Medical Records Retention Schedule

Options:

- A. Request SFD to develop policy that a) defines the circumstances in which photos may be transferred from the Emergency Scene and Hazardous Materials Cameras, and b) documents SFD's records retention schedule.
- B. Take no action.

3. SFD's Policy and Operating Guidelines do not establish guidelines for when and how SFD will share data from Emergency Scene Cameras or Hazardous Materials Cameras with law enforcement agencies

SFD is working to develop a policy for the Hazardous Materials unit regarding sharing with law enforcement agencies.

Options:

- A. Request that SFD work with the City Attorney's Office to develop a process by which law enforcement agencies request for evidentiary purposes photos or videos taken with SFD's Emergency Scene Cameras and Hazardous Materials Cameras and that SFD develop a Memorandum of Understanding with the SPD establishing common protocols for data retention and sharing of data.
  - B. Take no action.
4. SFD's Policy and Operating Guidelines do not define or require training on what can and cannot be photographed with Emergency Scene and Hazardous Materials Cameras, including specific protections for the privacy of individuals and homes.

Training for Hazardous Materials Cameras users will be included in a new policy that addresses the use of this technology, photo retention, and sharing of records with law enforcement. The new policy will be discussed during upcoming labor negotiations.

Options:

- A. Request that SFD develop consistent in-service training protocols, including specific protections for the privacy of individuals and homes, for users of all department issued digital cameras and video equipment.
- B. Take no action.

### **Next Steps**

If the Committee votes on September 15, the Council could consider voting on the bill at its September 20 meeting.

### **Attachments:**

1. Background Summary and Surveillance Impact Report Process

cc: Esther Handy, Director  
Dan Eder, Deputy Director

## Attachment 1 - Background Summary and Surveillance Impact Report Process

### Recent Legislative History

[Ordinance 125376](#), passed by Council on July 31, 2017, required City of Seattle departments intending to acquire surveillance technology to obtain advance Council approval, by ordinance, of the acquisition and of a surveillance impact report (SIR).<sup>1</sup> Departments must also submit a SIR for surveillance technology in use when Ordinance 125376 was adopted (referred to in the ordinance as “retroactive technologies”). The Executive originally included 28 “retroactive technologies,” on its [November 30, 2017 Master List](#) but revised that list to 26 in [December 2019](#). As of September 1, 2021, the Council has approved 14 SIRs and extended the initial March 3, 2020 deadline to March 1, 2022 for completion of the final group of SIRs.<sup>2</sup> Either the Chief Technology Officer or the Council may determine whether a specific technology is “surveillance technology” and thus subject to the requirements of SMC 14.18. Each SIR must describe protocols for a “use and data management policy” as follows:

- How and when the surveillance technology will be deployed or used and by whom, including specific rules of use
- How surveillance data will be securely stored
- How surveillance data will be retained and deleted
- How surveillance data will be accessed
- Whether a department intends to share access to the technology or data with any other entity
- How the department will ensure that personnel who operate the technology and/or access its data can ensure compliance with the use and data management policy
- Any community engagement events and plans
- How the potential impact of the surveillance on civil rights and liberties and potential disparate impacts on communities of color and other marginalized communities have been taken into account; and a mitigation plan
- The fiscal impact of the surveillance technology

### Community Surveillance Working Group

On October 5, 2018, Council passed [Ordinance 125679](#), amending SMC 14.18, creating a “community surveillance working group” charged with creating a Privacy and Civil Liberties Impact Assessment for each SIR. At least five of the seven members of the Working Group must represent groups that have historically been subject to disproportionate surveillance, including

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<sup>1</sup> As codified in SMC 14.18.030, Ordinance 125376 identified a number of exemptions and exceptions to the required Council approval, including information voluntarily provided, body-worn cameras and cameras installed in or on a police vehicle, cameras that record traffic violations, security cameras and technology that monitors City employees at work.

<sup>2</sup> As provided for in [Ordinance 125679](#), Council has granted four six-month extension requests: first to accommodate extended deliberation of the first two SIRs; and then three more primarily due to COVID-related delays and to provide additional time for public engagement.

## Attachment 1 - Background Summary and Surveillance Impact Report Process

Seattle’s diverse communities of color, immigrant communities, religious minorities, and groups concerned with privacy and protest.<sup>3</sup> Each Privacy and Civil Liberties Impact Assessment must describe the potential impact of the surveillance technology on civil rights and liberties and potential disparate impacts on communities of color and other marginalized communities and will be included in the SIR. Prior to submittal of a SIR to Council, the Chief Technology Officer may provide a written statement that addresses privacy rights, civil liberty or other concerns in the Working Group’s impact assessment.

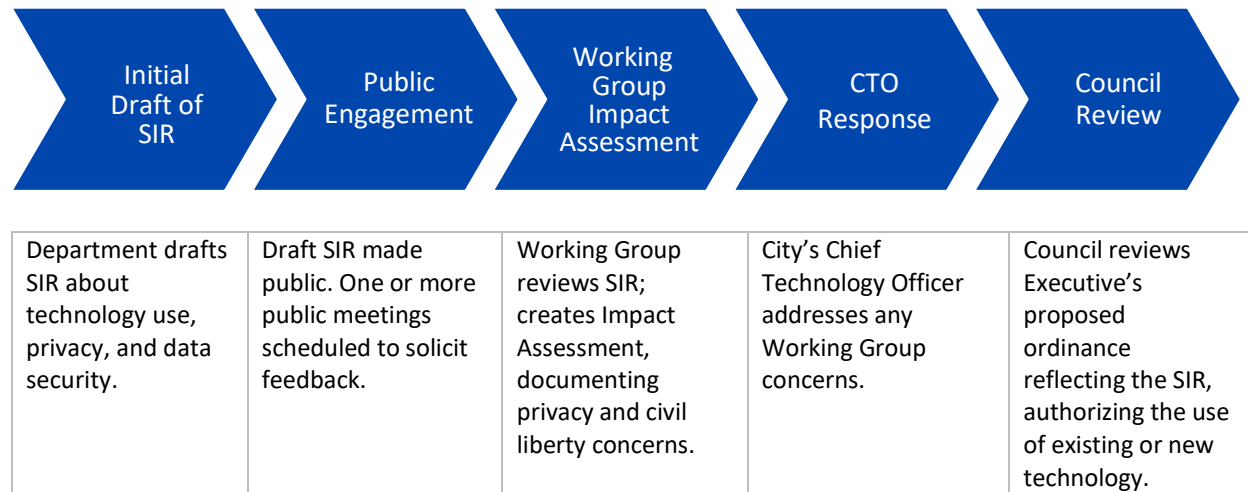
### Executive Overviews

In May 2019, members of the Governance, Equity, and Technology Committee requested that IT staff prepare a summary section for each of the two lengthy SIR documents under review at that time. The Committee then accepted the resultant “Condensed Surveillance Impact Reports (CSIRs) together with the complete SIRs. The Executive has continued this practice with subsequent SIRs but has renamed the documents “Executive Overviews.” The Operational Policy Statements in the Executive Overview represent the only allowable uses of the subject technology.

### SIR Process

Chart 1 is a visual of the SIR process from inception to Council Review:

*Chart 1. Surveillance Impact Report (SIR) Process*



<sup>3</sup> The Mayor appoints four members and Council appoints three members.