



# Surveillance Impact Report

Body-Worn Cameras  
Fire Department

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As required by San Francisco Administrative Code, Section 19B, departments must submit a Surveillance Impact Report for each surveillance technology to the Committee on Information Technology ("COIT") and the Board of Supervisors.

The Surveillance Impact Report details the benefits, costs, and potential impacts associated with the Department's use of body-worn cameras.

## DESCRIPTION OF THE TECHNOLOGY

The Department's mission is to protect the lives and property of the people of San Francisco and its visitors from fires, natural disasters, accidents, hazardous materials incidents, and other causes requiring a rapid and skilled response by land or water; serve the needs of its most vulnerable residents through community paramedicine, and save lives and reduce suffering by providing emergency medical services; prevent harm through prevention services and education programs; and to provide a work environment that is free from harassment and discrimination, and values health, wellness, cultural diversity, and equity.

In line with its mission, the Department uses body-worn cameras. This technology is a tool used by Department staff in front-line operational response, to improve aspects of the Department (such as training) that directly support the mission statement.

The Department shall use body-worn cameras only for the following authorized purposes:

- Use by Public Information Officer (PIO) at large incidents to capture video of surroundings and the totality of the incident (currently in use).

Any use(s) not identified in the Authorized Use(s) above are strictly prohibited.

Department technology is located or generally deployed to any large scale emergency event in San Francisco.

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## Surveillance Oversight Review Dates

COIT Review: October 21, 2021

Board of Supervisors Review: TBD

## **Technology Details**

The following is a product description of body-worn cameras:

Axon Flex 2 brings point-of-view video to the next level, with a rugged design, a range of mounts and advanced capabilities like unlimited HD and a 120-degree field of view.

## **How It Works**

To function, body-worn cameras are worn by the SFFD member to capture video. It is turned off and on solely by the member when he arrives on-scene.

All data collected or processed by body-worn cameras will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by Axon to ensure the Department may continue to use the technology.

## **IMPACT ASSESSMENT**

The impact assessment addresses the conditions for surveillance technology approval, as outlined by the Standards of Approval in San Francisco Administrative Code, Section 19B:

1. The benefits of the surveillance technology outweigh the costs.
2. The Department's Policy safeguards civil liberties and civil rights.
3. The uses and deployments of the surveillance technology are not based upon discriminatory or viewpoint-based factors and do not have a disparate impact on any community or Protected Class.

The Department's use of the surveillance technology is intended to support and benefit the residents of San Francisco while minimizing and mitigating all costs and potential civil rights and liberties impacts of residents.

### **A. Benefits**

The Department's use of Body-Worn Cameras has the following benefits for the residents of the City and County of San Francisco:

- Public Safety: The Department can review incidents for ways to improve response or training opportunities, which then can improve overall emergency response.

### **B. Civil Rights Impacts and Safeguards**

The Department has considered the potential impacts and has identified the technical, administrative, and physical protections as mitigating measures:

- The Department has considered the potential impacts and has identified the technical, administrative, and physical protections as mitigating measures:
  - o The San Francisco Fire Department strives to mitigate all potential civil rights impacts through responsible technology and associated data use policies and procedures. The Fire Department intends to use body-worn cameras and their associated data

exclusively for aforementioned authorized uses cases. All other uses, including surveillance of San Francisco residents or groups, are expressly prohibited.

- o To protect camera data from potential breach, misuse or abuse that may result in civil rights impacts, data is maintained on secure servers. Only persons authorized to utilize the raw data may access the information
  - o Only data that has been edited to remove PII will be shared and stored on servers, and sharing will only occur with partner CCSF agencies on a case by case basis or as required by law. To mitigate any potential impacts to residents' physical safety or economic loss through property damage
  - o Recorded data will not be collected, disseminated or retained solely for the purpose of monitoring activities protected by the U.S. Constitution, such as the First Amendment's protections of religion, speech, press, assembly, and redress of grievances (e.g., protests, demonstrations). Collection, use, dissemination, or retention of recorded data should not be based solely on individual characteristics (e.g., race, ethnicity, national origin, sexual orientation, gender identity, religion, age, or gender), which is a violation of the law.
- Administrative Safeguards: The vendor has a number of technical safeguards in place that are discussed in the section for technical safeguards. For the Department, as a policy we have limited the users that have any access to this system, currently limited to one IT staff and our Public Information Officer. This technology and purpose has been folded into the Department's social media policy, which is enforced and reviewed with any personnel that would have access to this information. Informal training on PII and redaction are done initially and on an as-needed basis to refresh rules and requirements pertaining to PII.
  - Technical Safeguards: Data is securely stored on the vendor's cloud site, where access is extremely limited by the Department. There are currently two authorized users for the account. Video is encrypted in transit and while in storage. In transit it is FIPS 140-2 validated, and the system is fully CJIS compliant. There are expanded audit trails for chain of custody and time stamps built into the system.
  - Physical Safeguards: Physical camera hardware is secured by member assigned to it and is worn when in operation. There is no physical protection from the uploaded data, as it is stored remotely on a cloud server.

### C. Fiscal Analysis of Costs and Benefits

The Department's use of body-worn cameras yields the following business and operations benefits:

- Potential Training Opportunities: Department staff could review video from an incident as part of an after-action review to give points and potential training points for future response improvements.

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

- Number of FTE (new & existing):

- o One H-20 Lieutenant
  - o One 1070 Project Manager
- The annual costs are:
  - o Total Salary & Fringe: 0
  - o Software: \$2000.00
  - o Hardware/ Equipment: 0
  - o Professional Services: 0
  - o Training: 0
  - o Other: 0

The Department funds its use and maintenance of the surveillance technology through the general fund.

### **COMPARISON TO OTHER JURISDICTIONS**

Body-worn cameras are currently utilized by other governmental entities for similar purposes.