City and County of San Francisco

Committee on Information Technology

July 19, 2021

Agenda

- COIT Overview
- CCSF Privacy & Surveillance Landscape
- Work to Date: Section 19B Compliance
- Recommendations to 19B

COIT Overview

We are the City & County of San Francisco's technology governance body.

COIT's structure is intended to provide a forum for City leadership to coordinate and collaborate. Through regular public meetings, COIT is also a vehicle to share with residents and the public the state of technology in the City.

Responsibilities

- Five-year technology plan

- Annual Budget

- Portfolio Management

- Technology Policy
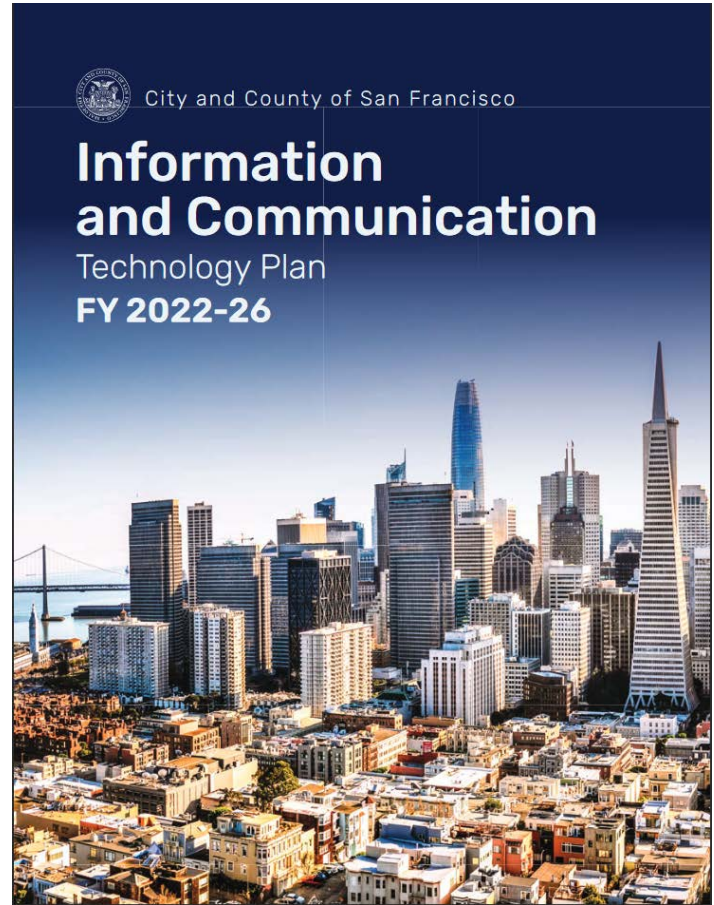
CCSF Privacy & Surveillance Landscape

Examples of Data/Privacy Regulations…

HIPAA – Health Insurance Portability and Accounting Act

FERPA – Family Educational Rights and Privacy Act

CJIS – Criminal Justice Information Services

PCI DSS – Payment Card Industry Data Security Standard

History: COIT Data/Privacy Policies

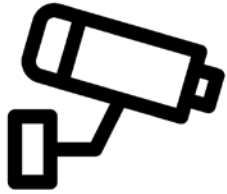**Cybersecurity (2016)** – Policy, training and awareness, and requirements

Data Governance (2017) – Data Classification Standard

Drones (2017) – Limited Authorized Use

All COIT Policies are available at:

https://sf.gov/information/coit-policy

Data Lifecycle

Collect

Process & Use

Share

Storage

Dispose

Created by Barudak Lier from Noun Project

Created by Gregor Cresnar from Noun Project

Created by Тимур Минвалеев from Noun Project
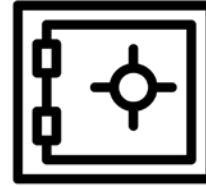
Created by Astatine Lab from Noun Project

Created by Pikselan from Noun Project

Upcoming Policy Development

- Data Minimization Guideline

- Public Noticing Standards

- Privacy Policies for digital services

Section 19B Compliance

Section 19B Department Requirements

- Surveillance Inventory (deadline August 29, 2019)

- Impact Report

- Surveillance Technology Policy

- Annual Report

Section 19B Definition of Duties

COIT's role is to:

- Post the surveillance inventory available at:
  https://sf.gov/resource/2020/surveillance-technology-inventory

- Work with departments on Impact Report and Policy

- Conduct public hearings and recommend action to the
  Board of Supervisors

- Post annual surveillance reports

SURVEILLANCE INVENTORY CATEGORY	NUMBER (2021)_
Ads and Notifications	12
Audio Recorders	3
Automatic License Plate Readers	5
Biometric Processing	8
Camera	58
Drone	6
Location Management	10
Misc	26
RFID/Toll Reader	4
Smart City Sensor	3
Social Media Monitoring	33
Total	**168**

Surveillance Toolkit

COIT's Toolkit aims to achieve:

○ A robust impact assessment

○ Streamline submission of all Ordinance requirements

○ Minimize implementation burden

○ Inform the Board of Supervisors' decision assessing whether the benefits of each surveillance technology outweigh the costs.

Surveillance Technology Toolkit

Purpose: The Surveillance Toolkit is a step-by-step guide to fill out the requirements in the Acquisition of Surveillance Technology Ordinance. This toolkit will help departments assess the following items for each surveillance technology:

A. Business Uses (i.e. Benefits)
B. Data Management Process & Lifecycle
C. Potential Impacts & Mitigation

The Surveillance Ordinance requires departments to assess the separate impact of every inventoried surveillance technology. By completing the toolkit, departments will have compiled the majority of information required by the Acquisition of Surveillance Technology Ordinance.

Tips: Please follow these tips as you complete the toolkit:

1. **Divide and conquer:** Some sections are better answered by certain department units. Please refer to "Best completed by" and forward appropriately.
2. **Do your best** and COIT will reach out if any further information is required.

Time required: The estimated time required for toolkit completion is 2-3 hours per technology.

Department:	
Technology Category:	
Name of the Technology:	
Is this an existing technology already in use by your department, or a proposed new technology?	
Custodian of Records:	

A. Business Uses (i.e. the benefits)

Best completed by: Business Owner
1.1 What is your Department's mission statement?
1.2 Describe how the surveillance technology is used to support your department's mission. [SIR]

Civil Liberties & Civil Rights Impact

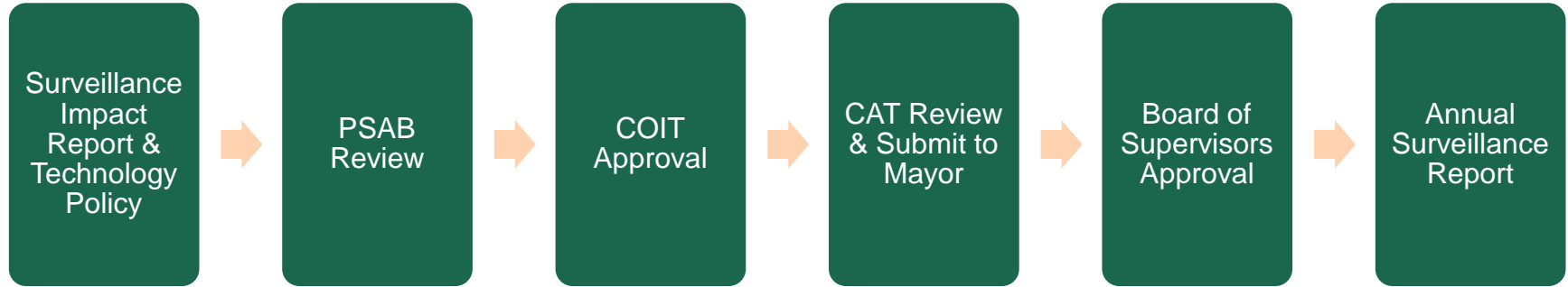| What are privacy impacts?	How do we mitigate impact?

NIST Privacy Framework
 	
   ○ Dignity Loss
   ○ Discrimination
   ○ Economic Loss
   ○ Loss of Autonomy
   ○ Loss of Liberty
   ○ Physical Harm
   ○ Loss of Trust
	Potential actions
	
	   ○ Administrative
	   ○ Technical
	   ○ Physical

Privacy & Surveillance Advisory Board

Public Hearings:

- 2nd and 4th Friday of each month

Membership:

Chair – Office of Contract Administration	Juvenile Probation
City Services Auditor	San Francisco International Airport
Controller	Committee on Information Technology
DataSF	Public Member
Department of Technology	

Review Process

Surveillance Impact Report & Technology Policy → PSAB Review → COIT Approval → CAT Review & Submit to Mayor → Board of Supervisors Approval → Annual Surveillance Report

Calendar Review

Number of public meetings since August 2019:

- 20 PSAB meetings

- 8 COIT meetings

COIT APPROVALS	TECHNOLOGY
February 20, 2020	RFID (SFPL)
July 17, 2020	Drones
January 21, 2021	Audio Recorder ALPR (Police)
February 4, 2021	ALPR
March 18, 2021	Security Cameras

Recommendations to 19B

Recommendation 1: Hire In-House Expertise

Some activities of a **Chief Privacy Officer (CPO)**:

- **Procurement**: City contracts should include privacy requirements, especially for third-party vendors with sensitive data.

- **Privacy by Design**: We need to embed privacy practices in the design of City products.

- **Trainings**: City staff need better training on privacy practices.

DataSF

COIT

Chief Privacy
Officer

City
Attorney

Cybersecurity
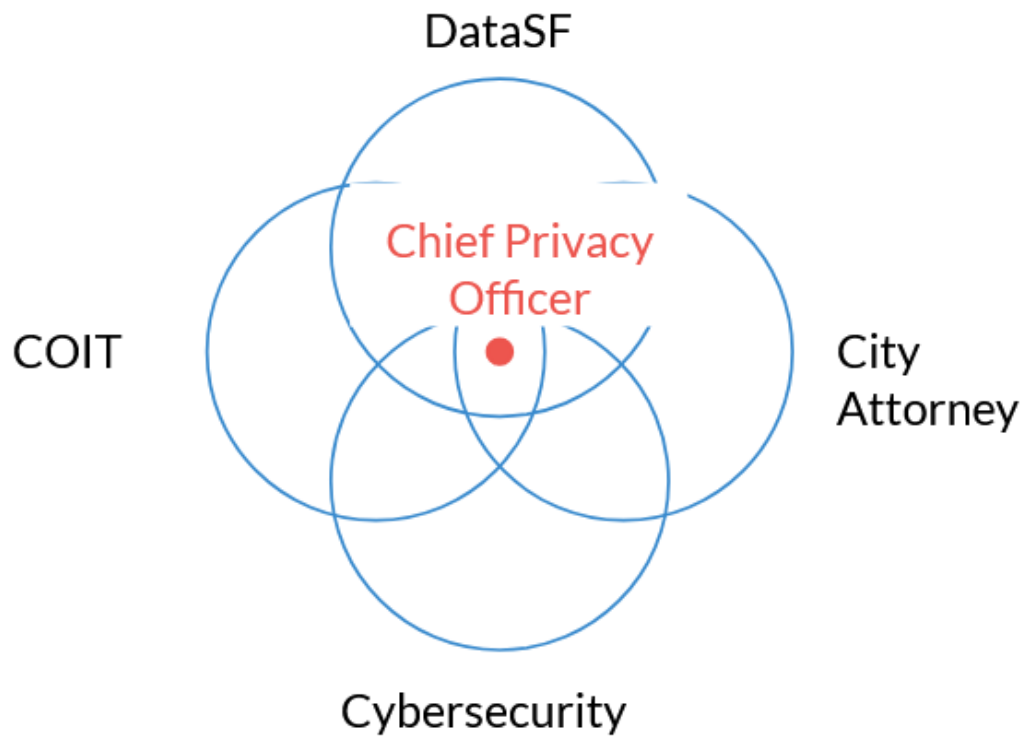
Recommendation 2: Citywide Policy

Current State:

- Current process is administrative burdensome and redundant.

Recommendation:

- A single citywide policy per technology category.

- Department's to create subsequent requirements on top of citywide baseline.

Recommendation 3: 19B Amendments

Current State:

- Definition of surveillance technology is overbroad.

- IT Infrastructure or services where consent is obtained considered surveillance technology.

Recommendation

- Refinement of definition and/or additional exemptions.

Thank You!