



Surveillance Technology Policy

Body-Worn Cameras
Recreation and Parks

The City and County of San Francisco values privacy and protection of San Francisco residents' civil rights and civil liberties. As required by San Francisco Administrative Code, Section 19B, the Surveillance Technology Policy aims to ensure the responsible use of Body-Worn Cameras itself as well as any associated data, and the protection of City and County of San Francisco residents' civil rights and liberties.

PURPOSE AND SCOPE

The Department's mission is to provide enriching recreational activities, maintain beautiful parks and preserve the environment for the well-being of our diverse community.

The Surveillance Technology Policy ("Policy") defines the manner in which the Body-Worn Cameras will be used to support this mission, by describing the intended purpose, authorized and restricted uses, and requirements.

This Policy applies to all to department personnel that use, plan to use, or plan to secure Body-Worn Cameras, including employees, contractors, and volunteers. Employees, consultants, volunteers, and vendors while working on behalf of the City with the Department are required to comply with this Policy.

POLICY STATEMENT

The authorized use of Body-Worn Cameras technology for the Department is limited to the following use cases and is subject to the requirements listed in this Policy.

Authorized Use(s):

- Recording video and audio footage in the event of an incident. Incidents can be:
 - Actual or potential criminal conduct
 - Situation when a Park Ranger reasonably believes recordings of evidentiary value may be requested
 - Calls for service involving a crime where the recording may aid in the apprehension/ prosecution of a suspect
- Providing recording to law enforcement or other authorized persons upon request.

Prohibited use cases include any uses not stated in the Authorized Use Case section.

Departments may use information collected from technology only for legally authorized purposes, and may not use that information to unlawfully discriminate against people based on race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, gender, gender identity,

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disability status, sexual orientation or activity, or genetic and/or biometric data. Additionally, departments may not use automated systems to scan footage and identify individuals based on any of the categories listed in the preceding sentence.

BUSINESS JUSTIFICATION

Body-Worn Cameras supports the Department's mission and provides important operational value in the following ways:

In line with its mission, the Department uses body worn cameras to protect the public and our staff in our parks, playgrounds and at special events. The Department can review footage for improvements in response or for training opportunities.

In addition, Body-Worn Cameras promises to benefit residents in the following ways:

- Public safety - Protect safety of residents while promoting an open, safe and welcoming environment
- Criminal justice - Providing recording to law enforcement or other authorized persons upon request.

Body-Worn Cameras will benefit the department in the following ways:

- Staff Safety - Ensure more accountability of actions of staff
- Financial and Time Savings - Recording available so no need to do individual assessment for any incidents

To achieve its intended purpose, a Body-Worn Camera (hereinafter referred to as "surveillance technology") is a device worn by a law enforcement officer that makes an electronic audio and video recording of activities that take place during any law enforcement action. In order to function, the Park Ranger turns the body worn camera on and off. Once a Park Rangers activates the body worn camera, he/she must make every reasonable effort to have the device remain on until the incident has concluded. Park Rangers download the recordings which are saved on Evidence.com.

POLICY REQUIREMENTS

This Policy defines the responsible data management processes and legally enforceable safeguards required by the Department to ensure transparency, oversight, and accountability measures.

Department use of surveillance technology and information collected, retained, processed or shared by surveillance technology must be consistent with this Policy; must comply with all City, State, and Federal laws and regulations; and must protect all state and federal Constitutional guarantees.

Specifications: The software and/or firmware used to operate the surveillance technology must be up to date and maintained.

Safety: Surveillance technology must be operated in a safe manner. Surveillance technology should not be operated in a way that infringes on resident civil rights, including privacy, or causes personal injury or property damage.

Data Collection: Departments shall minimize the use, collection, and retention of Personally Identifiable Information (PII) to what is strictly necessary to accomplish the intended purpose of the surveillance technology.

Department shall only collect data required to execute the authorized use case. All data collected by the surveillance technology, including PII, shall be classified according to the City's [Data Classification Standard](#).

Should information be incidentally collected that is not necessary to accomplish the intended purpose of the surveillance technology, including information that may be used to identify persons or private information, Department shall remove all incidental PII from raw data.

The surveillance technology collects the following data types:

Data Type	Data Format	Data Classification
<ul style="list-style-type: none">- Facial images,- voice audio- location- vehicle license plate number- Additionally, Park Rangers may request personal information (e.g. name) post the incident.	MOV, AVI	Level 2

Access: All parties requesting access must adhere to the following rules and processes (please refer to the data sharing section to ensure all information covered in that section is also included below):

- Prior to accessing or using data, authorized individuals receive training in system access and operation, and instruction regarding authorized and prohibited uses.
- Access to recorded footage is restricted to the Chief Park Ranger or designee. Recorded footage is accessed only in response to an incident.

Data must always be scrubbed of PII as stated above prior to public use.

A. Department employees

Once collected, the following roles and job titles are authorized to access and use data collected, retained, processed or shared by the surveillance technology:

- Chief Park Rangers (0951)
- Lieutenant Park Ranger (8210 - Lead)

B. Members of the public, including criminal defendants

The Recreation and Parks Department will comply with the California Public Records Act, the San Francisco Sunshine Ordinance, the requirements of the federal and State Constitutions, and federal and State civil procedure laws and rules.

Collected data that is classified as Level 1-Public data may be made available for public access or release via DataSF's [Open Data](#) portal. Anyone, including criminal defendants, may access such data. Open Data has a Public Domain Dedication and License, and makes no warranties on the information provided. Once public on Open Data, data can be freely shared, modified, and used for any purpose without any restrictions. Any damages resulting from use of public data are disclaimed, including by criminal defendants.

Members of the public, including criminal defendants, may also request access by submission of a request pursuant to San Francisco's [Sunshine Ordinance](#). No record shall be withheld from disclosure in its entirety unless all information contained in it is exempt from disclosure under express provisions of the California Public Records Act or some other statute.

Data Security: Department shall secure PII against unauthorized or unlawful processing or disclosure; unwarranted access, manipulation or misuse; and accidental loss, destruction, or damage. Surveillance technology data collected and retained by the Department shall be protected by the safeguards appropriate for its classification level(s).

To protect surveillance technology information from unauthorized access and control, including misuse, Departments shall, at minimum, apply the following safeguards:

- Access limited only to Chief Park Ranger or designee. Without training or appropriate security levels in software, recordings cannot be accessed.

Data Sharing: The Recreation and Parks Department will endeavor to ensure that other agencies or departments that may receive data collected by Recreation and Parks's Body-Worn Cameras Policy will act in conformity with this Policy.

For internal and externally shared data, shared data shall not be accessed, used, or processed by the recipient in a manner incompatible with the authorized use cases stated in this Policy.

The Recreation and Parks Department shall ensure proper administrative, technical, and physical safeguards are in place before sharing data with other CCSF departments, outside government entities, and third-party providers or vendors. (See Data Security)

The Recreation and Parks Department shall ensure all PII and restricted data is de-identified or adequately protected to ensure the identities of individual subjects are effectively safeguarded.

Further, in sharing data, processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying an individual person, data concerning health or data concerning an individual person's sex life or sexual orientation shall be prohibited.

Each department that believes another agency or department receives or may receive data collected from its use of surveillance technologies should consult with its assigned deputy city attorney regarding their response.

Before sharing data with any recipients, the Department will use the following procedure to ensure appropriate data protections are in place:

- X Confirm the purpose of the data sharing aligns with the department's mission.
- X Consider alternative methods other than sharing data that can accomplish the same purpose.
- X Redact names, scrub faces, and ensure all PII is removed in accordance with the department's data policies.
- X Review of all existing safeguards to ensure shared data does not increase the risk of potential civil rights and liberties impacts on residents.
- X Evaluation of what data can be permissibly shared with members of the public should a request be made in accordance with the San Francisco's Sunshine Ordinance.
- X Ensure data will be shared in a cost-efficient manner and exported in a clean, machine-readable format.

The Recreation and Parks Department will comply with the California Public Records Act, the San Francisco Sunshine Ordinance, the requirements of the federal and State Constitutions, and federal and State civil procedure laws and rules.

The Department currently participates in the following sharing practices:

A. Internal Data Sharing

Department shares the following data with the recipients:

Data Type	Data Recipient
Recordings from body worn cameras	Police, Sheriff, City Attorney, District Attorney, and Public Defender

Data sharing occurs at the following frequency:

- When requested, pursuant to a subpoena.

B. External Data Sharing

Department shares the following data with the recipients:

Data Type	Data Recipient
Recordings from body worn cameras	Outside law enforcement

Data sharing occurs at the following frequency:

- When requested.

To ensure that entities receiving data collected by the surveillance technology comply with the Surveillance Technology Policy, Department shall:

- The Chief Park Ranger will be responsible for enforcing the Surveillance Technology policy through its incorporation into the overall Department Policy for Body Worn Cameras.

Before data sharing with any recipient, the Department will use the following procedure to ensure appropriate data protections are in place:

- Confirm the purpose of the data sharing aligns with the department's mission.
- Ensure shared data will be done in a cost-efficient manner and exported in a clean, machine-readable format.
- Redact names, scrub faces, and ensure all PII is removed in accordance with the department's data policies.

Data Retention: Department may store and retain raw PII data only as long as necessary to accomplish a lawful and authorized purpose.

The Department's data retention period and justification are as follows:

Data Retention Period	Data Retention Justification
Body worn camera recordings will be stored for a minimum of one (1) year.	This retention period allows for ample time for security staff to review footage related to security incidents and/or external requests for records.

PII data shall not be kept in a form which permits identification of data subjects for any longer than is necessary for the purposes for which the personal data are processed.

PII data collected by the surveillance technology may be retained beyond the standard retention period only in the following circumstance(s):

- If data is associated with an incident, it may be kept for longer than the standard retention period:
 - Use of force - not deleted
 - Investigations - until case closure

Departments must establish appropriate safeguards for PII data stored for longer periods.

Data will be stored in the following location:

- Local Storage
- Software as a Service Product

Data Disposal: Upon completion of the data retention period, Department shall dispose of data in the following manner:

Practices:

- Evidence.com auto-deletes after 1 year.

Processes and Applications:

- Evidence.com has a feature that allows for redaction/ de-identification. This will be performed by the Lieutenant 8210 -Lead.

Training: To reduce the possibility that surveillance technology or its associated data will be misused or used contrary to its authorized use, all individuals requiring access must receive training on data security policies and procedures.

At the very least, department shall require all elected officials, employees, consultants, volunteers, and vendors working with the technology on its behalf to read and formally acknowledge all authorized and prohibited uses. Department shall also require that all individuals requesting data or regularly requiring data access receive appropriate training before being granted access to systems containing PII.

- Training on Evidence.com on how to view and download recordings is required.
- Evidence.com is the storage location for footage captured by Axon Body Worn Cameras.

COMPLIANCE

Department shall oversee and enforce compliance with this Policy using the following methods:

- The Chief Park Ranger or designee will be responsible for enforcing the Surveillance Technology policy through its incorporation into the overall Department Policy for Body Worn Cameras.

Department shall be assigned the following personnel to oversee Policy compliance by the Department and third-parties:

- Chief Park Ranger (0951) or designee - Lieutenant (8210 - Lead).

Sanctions for violations of this Policy include the following:

- Violation of the policy will be subject to standard RecPark departmental policies, which may include disciplinary action up to and including termination.

If a Department is alleged to have violated the Ordinance under San Francisco Administrative Code Chapter 19B, Department shall post a notice on the Department’s website that generally describes any corrective measure taken to address such allegation.

Department is subject to enforcement procedures, as outlined in San Francisco Administrative Code Section 19B.8.

EXCEPTIONS

Only in exigent circumstances or in circumstances where law enforcement requires surveillance technology data for investigatory or prosecutorial functions may data collected, retained or processed by the surveillance technology be shared with law enforcement.

DEFINITIONS

Personally Identifiable Information: Information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Raw Data: Information collected by a surveillance technology that has not been processed and cleaned of all personal identifiable information. The distribution and use of raw data is tightly restricted.

Exigent Circumstances: An emergency involving imminent danger of death or serious physical injury to any person that requires the immediate use of Surveillance Technology or the information it provides.

AUTHORIZATION

Section 19B.4 of the City’s Administrative Code states, “It is the policy of the Board of Supervisors that it will approve a Surveillance Technology Policy ordinance only if it determines that the benefits the Surveillance Technology ordinance authorizes outweigh its costs, that the Surveillance Technology Policy ordinance will safeguard civil liberties and civil rights, and that the uses and deployments of the Surveillance Technology under the ordinance will not be based upon discriminatory or viewpoint-based factors or have a disparate impact on any community or Protected Class.”

QUESTIONS & CONCERNS

For the Public:

Members of the public can register complaints/concerns or submit questions to San Francisco Recreation and Parks through several ways:

- Send written correspondence to McLaren Lodge in Golden Gate Park, 501 Stanyan Street, San Francisco, CA 94117
- Call to the RPD Front Desk 415-831-2700
- Send an email to rpdinfo@sfgov.org

Department shall acknowledge and respond to complaints and concerns in a timely and organized response. To do so, Department shall:

- All calls/complaints from the public received via mail or via call to the RPD Front Desk are routed to the RPD IT HelpDesk and logged in our department's request management system. Any requests from 311 are received in our department's dispatch system and routed to the RPD IT HelpDesk which then is logged in the request management system.
- Once the request is tracked in the request management system, IT will work with all relevant parties to ensure completion.
- Review of open / closed requests occur with the CIO on a weekly basis.

For City and County of San Francisco Employees:

All questions regarding this policy should be directed to the employee's supervisor or to the director. Similarly, questions about other applicable laws governing the use of the surveillance technology or the issues related to privacy should be directed to the employee's supervisor or the director.