



Surveillance Impact Report

AI and Algorithms
Policy Accountability

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 AI and Algorithms.”

DESCRIPTION OF THE TECHNOLOGY

The Department of Police Accountability is committed to providing the City of San Francisco with independent and impartial law enforcement oversight through investigations, policy recommendations, and performance audits to ensure that policing reflects the values and concerns of the community.

In line with its mission, the Department uses AI and Algorithms to:

- *comply with state public records law and will also help support DPA's mission of police accountability through transparency. This technology is needed because Penal Code 832.7 requires DPA to redact and release video related to officer-involved shootings, great bodily injury cases, incidents where an officer commits a sexual assault, and incidents where an officer is dishonest.*
- *redact the faces of complainants and witnesses, bystanders, juveniles, and victims. The tool will be used to redact video that already exists. The tool will enable DPA to protect the identities of people who appear in police incident video.*
- *[Note: The DPA will not use the tool to record anything. The tool will be used to redact videos that were already recorded by the police department and other third parties. Purchasing this tool will not cause any new video to be recorded. DPA will only use the tool on existing video that is sent to DPA in connection with police misconduct investigations. The California Public Records Act requires DPA to publicly disclose witness, surveillance, and body-worn camera video gathered in connection with certain categories of police misconduct cases. Members of the public appear in these videos and, to protect their identities, their faces must be blurred before the records are published. The redaction tool will enable DPA to protect the privacy of community members while complying with state laws requiring the disclosure of video related to police incidents.]*

Police Accountability shall use AI and Algorithms only for the following authorized purposes:

1. *To redact the following:*
 - a. *faces of witnesses and bystanders to conceal identities of complainants and witnesses.*
 - b. *Residential addresses of complainants and witnesses to conceal identities of complainants and witnesses.*

Surveillance Oversight Review Dates

COIT Review: TBD

Board of Supervisors Review: TBD

- c. *Personally-identifiable information such as the residential addresses of complainants, victims, and witnesses.*
- d. *Personally-identifiable information such as driver licenses of complainants, victims, and witnesses.*
- e. *Other information that would reveal the identity of a complainant, victim, or witness, such as a family photograph appearing inside a residence.*

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

Further, 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.

Department technology may be deployed in the following locations, based on use case:

The technology will not be deployed to any location. The technology will be used to redact existing video.

Technology Details

The following is a product description of AI and Algorithm technology:

Whether a public information request or police consent decree, agencies are often required to distribute evidence outside the investigative team. Prior to evidence release, sensitive information is required to be redacted to protect the identity of innocent individuals and preserve investigations. With Veritone Redact, you can quickly redact sensitive items within audio, video and image-based evidence and improve the speed and efficiency of which your agency can respond.

A. How It Works

To function, the Video Redaction Tool: *is a CJIS-compliant cloud-based application. Videos are uploaded to a secure cloud server and then an AI tool scans the video to suggest images to redact. A staff member then reviews the suggested redactions and accepts, alters, and augments the images marked for redaction.*

The redaction technology uses artificial intelligence to identify faces and not individuals. The tool identifies face shapes but does not recognize individual faces. The AI tool that identifies objects for redaction is based on shapes and no personal information is stored.

The required redactions are: the faces of involved parties, witnesses, and bystanders; license plates; identification cards; residential addresses; family photos; and other personally-identifiable information. Witnesses can include bystanders, reporting parties, and arrestees.

A typical example of a record that needs to be redacted is police body-worn camera footage depicting an officer-involved shooting. Before releasing the video to the public, DPA would redact personally-identifiable information and information that would reveal the identity of a complainant or witness

(examples: faces of witnesses, faces of bystanders, faces of juveniles, family photos on walls, and identification cards.)

There is no existing process for redacting video. This is a completely new process for the department. There is currently no video redaction solution in place in the department.

DPA is trying to purchase this tool to comply with a SB1421, a bill that made thousands of previously confidential police misconduct investigation records subject to disclosure in response to a California Public Records Act request.

All data collected or processed by Video Redaction Tool will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by Veritone 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 the Video Redaction Tool has the following benefits for the residents of the City and County of San Francisco:

Education: *Public record disclosures related to police accountability are used by journalists and educators to inform the public and to educate law enforcement and other oversight agencies by examining the outcomes and impact of police actions.*

Public Safety: *Transparency is one of the four pillars of procedural justice, which is required for effective community policing. A media redaction tool will enable DPA to publicly disclose policing videos so that community members can participate in policing reform initiatives in a meaningful and educated way.*

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 DPA strives to mitigate all potential civil rights impacts through responsible technology and associated data use policies and procedures and intends to use video redaction software and their associated data exclusively for authorized uses cases.

Media will be uploaded to the redaction tool to redact PII, including faces, license plates, addresses, and other sensitive information, prior to public disclosure.

The tool will only be used to redact existing media that is gathered during the course of peace officer personnel investigations. The DPA will not use the tool to track or create profiles for any individuals.

Administrative Protections: *The redaction tool will be used to remove confidential information from video provided to DPA by third parties. Only DPA staff will have access to the video materials and redaction tool.*

Technical Protections: *The tool is password protected and Criminal Justice Information Systems (CJIS) compliant.*

Physical Protections: *The tool will be used in an office area that is not publicly accessible. The office has locked doors.*

C. Fiscal Analysis of Costs and Benefits

The Department's use of Video Redaction Tool yields the following business and operations benefits:

Financial savings: The video redaction tool automates time-consuming video edits. Billing is based on the length of the edited video, not how long it takes to edit the video. By contrast, vendors charge by the number of hours to complete a task. Example. Using vendors to release a 1 hour video would entail: 1) paying \$250 to transcribe the video, 2) reviewing the transcript internally and marking it for redaction (2 staff hours), 3) sending the video and transcript to a video redaction vendor for an estimated cost of \$400, 4) reviewing the redacted video for accuracy (3 staff hours). Using an in-house tool to release a 1-hour video would entail: 1) a staff person would spend 2-3 hours reviewing and redacting the video, 2) other staff would spend 2 hours checking for accuracy, 3) DPA would be charged approximately \$60 in vendor fees.

Time savings: Based on peer experiences, it is estimated to take five times the length of a video to redact faces and other personally-identifiable information using traditional software. Because of the automatic shape tracking, DPA estimates that it will take only 2-3 times the length of a video to perform redactions. Compared with using a vendor, using an in-house tool will use approximately 50% fewer staff hours per hour of redacted video.

Improved data quality: The shape-tracking tool will enable more precise blurring redactions than traditional editing tools.

The total fiscal cost, including initial purchase, personnel and other ongoing costs is

[Toolkit 2.0 (entire table)]. Number of FTE (new & existing)	5
--	---

Total Salary & Fringe <i>(Fringe: Annual x .33)</i>	921,351	0
	Annual Cost	One-Time Cost
Software	4,950	0
Hardware/Equipment	0	0
Professional Services	0	0
Training	0	0
Other	0	0
Total Cost [Auto-calculate]	\$926,301	0
	2.1 Please disclose any current or potential sources of funding (e.g. potential sources = prospective grant recipients, etc.). ^{SIR,} ASR	
	<p>Personnel: Staff time devoted to redacting video is required by California law and cannot be charged to requestors.</p> <p>Equipment: There are no equipment requests associated with this purchase.</p>	

The Department funds its use and maintenance of the surveillance technology through:

Personnel: Staff time devoted to redacting video is required by California law and cannot be charged to requestors.

Equipment: There are no equipment requests associated with this purchase.

COMPARISON TO OTHER JURISDICTIONS

Video Redaction Tools are currently utilized by other governmental entities for similar purposes. In order to provide greater transparency to the public, many police departments in the United States now use video redaction technology so they can release video footage involving police officers without revealing the identities of civilian individuals shown in those videos.

APPENDIX A: Surveillance Impact Report Requirements

The following section shows all Surveillance Impact Report requirements in order as defined by the San Francisco Administrative Code, Section 19B.

1. Information describing the Surveillance Technology and how it works, including product descriptions from manufacturers.

Whether a public information request or police consent decree, agencies are often required to distribute evidence outside the investigative team. Prior to evidence release, sensitive information is required to be redacted to protect the identity of innocent individuals and preserve investigations. With Veritone Redact, you can quickly redact sensitive items within audio, video and image-based evidence and improve the speed and efficiency of which your agency can respond.

The redaction tool will be used to blur the faces of complainants, victims, witnesses. Witnesses can include bystanders, reporting parties, and arrestees. The redaction technology uses artificial intelligence to identify faces and not individuals. The tool identifies face shapes but does not recognize individual faces. The AI tool that identifies objects for redaction is based on shapes and no personal information is stored.

The video redaction tool is a CJIS-compliant cloud-based application. Videos are uploaded to a secure cloud server and then an AI tool scans the video to suggest images to redact. A staff member then reviews the suggested redactions and accepts, alters, and augments the images marked for redaction. The required redactions are: the faces of involved parties, witnesses, and bystanders; license plates; identification cards; residential addresses; family photos; and other personally-identifiable information.

2. Information on the proposed purpose(s) for the Surveillance Technology.

This technology is needed because Penal Code 832.7 requires DPA to redact and release video related to officer-involved shootings, great bodily injury cases, incidents where an officer commits a sexual assault, and incidents where an officer is dishonest. The tool will enable DPA to comply with state public records law and will also help support DPA's mission of police accountability through transparency.

The DPA will use the tool to redact the faces of complainants and witnesses, bystanders, juveniles, and victims. The tool will be used to redact video that already exists. The tool will enable DPA to protect the identities of people who appear in police incident video. Purchasing this tool will not cause any new video to be recorded. DPA will only use the tool on existing video that is sent to DPA in connection with police misconduct investigations.

The California Public Records Act requires DPA to publicly disclose witness, surveillance, and body-worn camera video gathered in connection with certain categories of police misconduct cases. Members of the public appear in these videos and, to protect their identities, their faces must be blurred before the records are published. The redaction tool will enable DPA to protect

the privacy of community members while complying with state laws requiring the disclosure of video related to police incidents.

This tool will allow DPA to redact the following:

- a. faces of witnesses and bystanders to conceal identities of complainants and witnesses.*
- b. Residential addresses of complainants and witnesses to conceal identities of complainants and witnesses.*
- c. Personally-identifiable information such as the residential addresses of complainants, victims, and witnesses.*
- d. Personally-identifiable information such as driver licenses of complainants, victims, and witnesses.*
- e. Other information that would reveal the identity of a complainant, victim, or witness, such as a family photograph appearing inside a residence.*

This technology provides the following benefits of the residents of San Francisco:

Education: *Public record disclosures related to police accountability are used by journalists and educators to inform the public and to educate law enforcement and other oversight agencies by examining the outcomes and impact of police actions.*

Public Safety: *Transparency is one of the four pillars of procedural justice, which is required for effective community policing. A media redaction tool will enable DPA to publicly disclose policing videos so that community members can participate in policing reform initiatives in a meaningful and educated way.*

This technology benefits department operational in the following ways:

Financial savings: *The video redaction tool automates time-consuming video edits. Billing is based on the length of the edited video, not how long it takes to edit the video. By contrast, vendors charge by the number of hours to complete a task. Example. Using vendors to release a 1 hour video would entail: 1) paying \$250 to transcribe the video, 2) reviewing the transcript internally and marking it for redaction (2 staff hours), 3) sending the video and transcript to a video redaction vendor for an estimated cost of \$400, 4) reviewing the redacted video for accuracy (3 staff hours). Using an in-house tool to release a 1-hour video would entail: 1) a staff person would spend 2-3 hours reviewing and redacting the video, 2) other staff would spend 2 hours checking for accuracy, 3) DPA would be charged approximately \$60 in vendor fees.*

Time savings: *Based on peer experiences, it is estimated to take five times the length of a video to redact faces and other personally-identifiable information using traditional software. Because of the automatic shape tracking, DPA estimates that it will take only 2-3 times the length of a video to perform redactions. Compared with using a vendor, using an in-house tool will use approximately 50% fewer staff hours per hour of redacted video.*

Improved data quality: *The shape-tracking tool will enable more precise blurring redactions than traditional editing tools.*

<p>3. If applicable, the general location(s) it may be deployed and crime statistics for any location(s).</p>
<p>N/A</p>
<p>4. An assessment identifying any potential impact on civil liberties and civil rights and discussing any plans to safeguard the rights of the public.</p>
<p><i>The DPA strives to mitigate all potential civil rights impacts through responsible technology and associated data use policies and procedures and intends to use video redaction software and their associated data exclusively for authorized uses cases.</i></p> <p><i>Media will be uploaded to the redaction tool to redact PII, including faces, license plates, addresses, and other sensitive information, prior to public disclosure.</i></p> <p><i>The tool will only be used to redact existing media that is gathered during the course of peace officer personnel investigations. The DPA will not use the tool to track or create profiles for any individuals.</i></p> <p>Administrative Protections: <i>The redaction tool will be used to remove confidential information from video provided to DPA by third parties. Only DPA staff will have access to the video materials and redaction tool.</i></p> <p>Technical Protections: <i>The tool is password protected and Criminal Justice Information Systems (CJIS) compliant.</i></p> <p>Physical Protections: <i>The tool will be used in an office area that is not publicly accessible. The office has locked doors.</i></p>
<p>5. The fiscal costs for the Surveillance Technology, including initial purchase, personnel and other ongoing costs, and any current or potential sources of funding.</p>
<p><i>The total initial and ongoing cost for this technology is \$926,301.00</i></p> <p><i>Current or potential sources of funding include:</i></p> <p>Personnel: <i>Staff time devoted to redacting video is required by California law and cannot be charged to requestors.</i></p> <p>Equipment: <i>There are no equipment requests associated with this purchase.</i></p>
<p>6. Whether use or maintenance of the technology will require data gathered by the technology to be handled or stored by a third-party vendor on an ongoing basis.</p>
<p><i>Data is handled (i.e. used or processed) or stored by an outside provider or third-party vendor on an ongoing basis. Edited videos will be stored on the cloud server for three years to allow time for redactions to be challenged. The vendor is Veritone. Data handling or storage by a third party vendor is required to use this technology.</i></p>

7. A summary of the experience, if any, other governmental entities have had with the proposed technology, including information about its effectiveness and any known adverse information about the technology such as anticipated costs, failures, or civil rights and civil liberties abuses.

Video Redaction Tools are currently utilized by other governmental entities for similar purposes. In order to provide greater transparency to the public, many police departments in the United States now use video redaction technology so they can release video footage involving police officers without revealing the identities of civilian individuals shown in those videos.

Releasing video footage of incidents involving police officers and members of the public allows for police accountability and can serve to promote a greater sense of public trust in law enforcement. The use of such technology allows for this accountability without revealing individual identities, which could show an individual in a sensitive, personal, or harmful situation. Additionally, redacting faces allows for any crime victims to remain anonymous, as is the norm for crime victims within the legal system.