



Surveillance Technology Policy

San Francisco International Airport
Security Cameras

The City and County of San Francisco values the 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 Department's Security Camera System 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 Surveillance Technology Policy ("Policy") defines the manner in which the Security Camera System (fixed or mobile) will be used to support department operations.

This Policy applies to all department personnel that use, plan to use, or plan to secure Security Camera Systems, 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

City departments using this policy will limit their use of Security Camera to the following authorized use cases and requirements listed in this Policy.

Authorized Use(s):

1. Live monitoring.
2. Recording of video and images.
3. Reviewing camera footage in the event of an incident.
4. Providing video footage/images to law enforcement or other authorized persons following an incident or upon request when the footage is subject to disclosure pursuant to a Public Records Act request.

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

Processing of personal data revealing legally protected categories, including racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, gender, gender identity, disability status, or an individual person's sex life or sexual orientation, and the processing of genetic data and/or biometric data for the purpose of uniquely identifying an individual person shall be prohibited.

Surveillance Oversight Review Dates

COIT Review: March 18, 2021

Board of Supervisors Review: August 4, 2021

BUSINESS JUSTIFICATION

In support of Department operations, Security Cameras promise to help with:

- Education
- Community Development
- Health Protect safety of staff, patrons, and facilities while promoting an open and welcoming environment.
- Environment
- Criminal Justice Review video footage after a security incident; provide video evidence to law enforcement or the public upon request when the footage is subject to disclosure pursuant to a Public Records Act request, or when the footage must be produced pursuant to a court order or subpoena.
- Jobs
- Housing
- Other Better management of city assets by leveraging remote condition assessment. Improvement of overall situational awareness.

In addition, the following benefits are obtained:

Benefit	Description
X Financial Savings	Department Security Camera Systems will save on building or patrol officers.
X Time Savings	Department Security Camera Systems will run 24/7, thus decreasing or eliminating building or patrol officer supervision
X Staff Safety	Security cameras help identify violations of City Employee’s Code of Conduct, Building Rules and Regulations, and City, State and Federal law and provide assurance that staff safety is emphasized and will be protected at their place of employment.
X Data Quality	Security cameras run 24/7/365 so full-time staffing is not required to subsequently review footage of security incidents. Data resolution can be set by level and is currently set to high resolution.
X Service Levels	Security cameras will enhance effectiveness of incident response and result in improved level of service.

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 security cameras must be kept up-to-date and maintained.

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

The surveillance technology collects some or all of the following data types:

<i>Data Type(s)</i>	<i>Format(s)</i>	<i>Classification</i>
Video and Images	MP4, AVI, MPEG	Level 3
Date and Time	MP4 or other format	Level 3
Geolocation data	TXT, CSV, DOCX	Level 3

Notification: Department shall notify the public of intended surveillance technology operation at the site of operations through signage in readily viewable public areas in accordance to Section 19.5 of the Administrative Code. Department notifications shall identify the type of technology being used and the purpose for such collection.

The Department's public notice will include the following items:

- Information on the surveillance technology
- Description of the authorized use
- Type of data collected
- Will persons be individually identified
- Data retention
- Department identification
- Contact information

Access: Prior to accessing or using data, authorized individuals receive training in system access and operation, and instruction regarding authorized and prohibited uses.

Access to live views and recorded footage is restricted to specific trained personnel. Recorded footage is accessed only in response to an incident.

Details on department staff and specific access are available in Appendix A.

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) as defined by the National Institute of Standards and Technology (NIST) security framework 800-53, or equivalent requirements from other major cybersecurity framework selected by the department.

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

- Encryption: Data retained by the Department will be encrypted. Raw data may be retained by the Department only for the authorized use case of sharing with law enforcement or the public.
- Storage: Any use of a third-party service provider must meet City's cyber security requirements.
- Audits: A data access log will be maintained by the Department for all Security Camera data that is processed and utilized. This log will include but is not limited to the following: date/time data was originally obtained/collected, reasons/intended use for data, department requesting data, date/time of access of raw data, outcome of data processing, as well as date processed data was delivered to users.

Data Sharing: 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. Department will endeavor to ensure that other agencies or departments that may receive data collected by their own Security Camera Systems will act in conformity with this Surveillance Technology Policy.

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.

Each department that believes another agency or department receives or may receive data collected from its use of Security Cameras 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.

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 may share Security Camera footage with the following entities:

A. Internal Data Sharing:

In the event of an incident, Security Camera images may be live-streamed or shared by alternative methods to the following agencies:

- Within the operating Department
- Police
- City Attorney
- District Attorney
- Sheriff
- On request following an incident.

Data sharing occurs at the following frequency:

- As needed.

B. External Data Sharing:

- Outside law enforcement agencies, with the public when the data is subject to disclosure pursuant to a Public Records Act request.

Data sharing occurs at the following frequency:

- As needed.

Data Retention: Department may store and retain raw PII data only as long as necessary to accomplish a lawful and authorized purpose. Department data retention standards should align with how the department prepares its financial records and should be consistent with any relevant Federal Emergency Management Agency (FEMA) or California Office of Emergency Services (Cal OES) sections.

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

- Security Camera data will be stored for a minimum of one (1) year to be available to authorized staff for operational necessity and ready reference, subject to technical limitations.

If data is associated with an incident, it may be kept for longer than the standard retention period.

- Justification: This retention period conforms with the available server system storage space and allows for ample time for security staff to review footage related to security incidents and/or external requests for records.

Data may be stored in the following location:

- X Local storage (e.g., local server, storage area network (SAN), network-attached storage (NAS), backup tapes, etc.)
- X Department of Technology Data Center
- X Software as a Service Product
- X Cloud Storage Provider

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

- Automatic overwrite of all existing files when standard data retention period ends. This may take the form of a delete/reformat, wipe, overwrite of existing data, or degaussing.

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.

- Annual cybersecurity training (COIT Policy Link)

COMPLIANCE

Department shall oversee and enforce compliance with this Policy according to the memoranda of understanding with the labor organization representing employees of the City and County of San Francisco.

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.

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.
--------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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."

Appendix A: Department Specific Responses

1. A description of the product, including vendor and general location of technology.
The Airport uses Verint Video Management Software (VMS) and, primarily, Pelco Analog and Digital Pan-Tilt-Zoom (PTZ) and fixed cameras. The cameras are installed in public areas of the Airport. Specific to this submission, the cameras are located pre-security.

The Verint system is a closed system, running on a security local area network that is not exposed to the internet.

2. The specific categories and titles of individuals who are authorized by the Department to access or use the collected information
 - *9202 911 Dispatcher*
 - *9203 911 Dispatch Supervisor*
 - *9212 Security Operations Center (SOC) Analyst*
 - *9213 Airfield Safety Officer*
 - *9220 SOC Supervisor*
 - *9221 Airport Operations Supervisor*
 - *Air Train Staff and Contractors*
 - *Aviation Security System MX Contractors*
 - *Ground Transportation Unit*
 - *Parking Management*
 - *SFPD-AB*
3. What procedures will be put in place by which members of the public can register complaints or concerns, or submit questions about the deployment or use of a specific Surveillance Technology, and how the Department will ensure each question and complaint is responded to in a timely manner.

Public question and complaint can be submitted via the:

- *Airport Guest Services ([Contact SFO](#))*
 - *Airport public email, phone, or website ([Contact SFO](#)), or*
 - *Airport Commission meetings ([How to Address the Commission](#))*
4. Specific details on where data will be stored (local, DT, SaaS, Cloud Storage) including name of vendor and retention period.
Data is in local server for 45 days then video files are transferred to Amazon Web Services for up to 1 year and files are deleted after 320 days based on lifecycle policy in AWS.
 5. Is a subpoena required before sharing with law enforcement?

- No

6. Questions & Concerns

- *In Authorized Use(s) - #3 "incident" should be defined*
- *In Notification – Admin Code Section 19.5 does not apply to Airport. Airport does not intend to post signage at location of each camera. However, Airport will publish public notice on its external website at www.flysfo.com.*
- *In Audits – "processed and utilized" is unclear. Alternate language suggested-- "shared with a 3rd party."*
- *In Audits –departments should not ask public record act requestors to provide their "reasons/intended use for data." "Intended use" is not a consideration when determining whether video footage is discloseable pursuant to a PRA request.*
- *In Data Sharing – 3rd procedure lists "Redact names, scrub faces..." The video is unalterable and names are not contained in the system. In addition, if video footage is subject to disclosure under PRA, scrubbing faces may be inappropriate unless privacy interests are implicated.*
- *In External Data Sharing – data collected can be requested under Public Records Request.*
- *In Data Retention – 1st paragraph states "...department prepares its financial records..." Not sure how this aligns with use of technology.*