



Surveillance Technology Policy

Illegal Dumping Camera System - Public Works

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 Illegal Dumping Camera Systems 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 care for and build the City's assets for the People of San Francisco

The Surveillance Technology Policy ("Policy") defines the manner in which the Illegal Dumping Camera System, comprised of automated license plate reader ("ALPR") technology together with pan, tilt, and zoom ("PTZ") cameras will be used to support this mission, by describing the intended purpose, authorized and restricted uses, and requirements.

This Policy applies to all department personnel that use, plan to use, or plan to secure the Illegal Dumping Camera System, 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 the Illegal Dumping Camera System technology for the Department is limited to the following use cases and is subject to the requirements listed in this Policy.

Authorized Use(s):

Discourage illegal dumping on City Streets. Identify and cite illegal dumping violators. Public Education and promotion of Public Works operations.

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.

Surveillance Oversight Review Dates

COIT Review: September 17, 2020

Board of Supervisors Review: August 4, 2021

Board of Supervisors Review: May 21, 2026

BUSINESS JUSTIFICATION

The Illegal Dumping Camera System supports the Department's mission and provides important operational value in the following ways:

Keeping the streets clean is a major challenge with ongoing illegal dumping. The Illegal Dumping Camera System will allow us to capture vehicle license plates and acts of illegal dumping to investigate, cite, and discourage illegal dumping.

Public Works has two Automated License Plate Readers that are currently mounted on a pole on our facility for proof of concept.

Public Works has nine Automated License Plate Readers mounted on fixed locations in a dumping hot spot neighborhood as a pilot project.

Public Works' intention is to procure and attach PTZ cameras on fixed locations alongside the ALPR cameras for a comprehensive 2-camera system capturing license plate data and video evidence of illegal dumping violations for investigation and enforcement.

Hotspots of illegal dumping are identified through the following sources:

- 311
- Employee observations during routine clean-up operations
- Complaints from constituents

In addition, the Illegal Dumping Camera System promises to benefit residents in the following ways:

- Education
- Community Development
- Health

☒ Environment

Illegal dumping affects adjacent neighbors and businesses. This will allow us to catch and prevent future illegal dumping in these neighborhoods.

- Criminal Justice
- Jobs
- Housing
- Other

The Illegal Dumping Camera System will benefit the department in the following ways:

Benefit	Description
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☒	Financial Savings	It would be very costly to pay for humans to sit all night and day to catch illegal dumpers
•	Time Savings	
☒	Staff Safety	The Department won't have to put staff in direct harm confronting illegal dumpers, won't have to have staff working at night in remote locations.
☒	Data Quality	The ALPR camera lens provides accurate license plate data. If the Department were relying on a human they might misread the plate during low-light conditions. The addition of PTZ cameras will capture evidence of illegal dumping activity; this data paired with license plate data will help substantiate enforcement efforts and citations issued to vehicle owners.
•	Other	

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 kept 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.

Data types can take the form video, audio, still images. Data formats can take the form of XML, PDF, HTML, Plain Text, JPEG, etc.

The surveillance technology collects the following data types:

<i>Data Type(s)</i>	<i>Format(s)</i>	<i>Classification</i>
License Plate Numbers	AVI JPEG, PNG, MEG or compressed	Level 3
Images of driver and passengers	JPEG, PNG, MP4 or compressed	Level 2,3
Images/Videos of people and objects	JPEG, MOV, AVI, MP4	Level 2, 3

The technology does not use facial recognition technology but does take photos/videos that may capture images of people . This technology will only be used to pursue enforcement of illegal activity. Images of people, drivers and passengers in the act of illegal dumping activity and vehicle license plate information will only be shared with relevant law enforcement for enforcement purposes.

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

Department includes the following items in its public notice:

- ☒ 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: 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):

Current Public Works employees must be approved to access the ALPR and PTZ data by the Deputy Director of Operations, Director of Communications, or Assistant Superintendent of Street Environmental Services.

The data use must be tied to the authorized use of this policy.

Authorized persons must sign an agreement to adhere to the Surveillance Technology Policy.

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.

- 7281 Street Environmental Services Operations Supervisors
- 0942 Superintendent, Street Environmental Services, Operations
- 0932 Asst. Superintendent, Street Environmental Services, Manager
- 0923 Manager II
- 0922 Manager, Street Environmental Services
- 1840 Junior Management Assistant, SES Operations Admins.
- 1312, 1314 Public Information Officer
- 1310 Public Relations Assistant
- 5408 Coordinator of Citizen Involvement
- 3374 Outreach Coordinator

The following providers are required to support and maintain the surveillance technology and its associated data to ensure it remains functional:

Public Works has no current contract with ALPR or PTZ technology vendors.

B. Members of the public

Public Works 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.

Data collected by surveillance technology will not be made available to members of the public, including criminal defendants.

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 to captured data will be limited to approved employees.

Data will be stored on computer hard drive, not on shared drive or cloud drive.

ALPR and PTZ data files on hard drive will be secured with an encryption and Identity Access Management (IAM) system.

Only scrubbed still or video frames can be used by the appropriate Public Works Operator to issue citations, or by Public Information Officer (Classification 1312 or 1314) if images are for public education and promotion of Public Works operations purpose.

Data Sharing: Public Works 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.

Public Works will endeavor to ensure that other agencies or departments that may receive data collected by Illegal Dumping Camera System will act in conformity with this Surveillance Technology 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.

Public Works 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)

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

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.

The Department currently participates in the following sharing practices:

A. Internal Data Sharing

Department shares the following data with the internal recipients:

Type	Recipient
Redacted or scrubbed data per Data Collection and Data Security section of Surveillance Tech Policy	SFPD City Attorney’s Office SF District Attorney’s Office

Data sharing occurs at the following frequency:

- On case use basis to pursue criminal charges for illegal dumping.

B. External Data Sharing

Department shares the following data with the external recipients:

Type	Recipient
	The Department does not share surveillance technology data externally with entities outside the City and County of San Francisco.

Data sharing occurs at the following frequency:

Not applicable; see above.

Before sharing data with any recipients, 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 by reviewing Surveillance Technology Policy before and after each use.
- ☒ Consider alternative methods other than sharing data that can accomplish the same purpose.
- ☒ Redact names, scrub faces, and ensure all PII is removed in accordance with the department's data policies.
- ☒ Review of all existing safeguards to ensure shared data does not increase the risk of potential civil rights and liberties impacts on residents.
- ☒ 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](#).
- ☒ Ensure shared data will be done in a cost-efficient manner and exported in a clean, machine-readable format.

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

Please list data retention schedules (i.e., x type of data will be retained for 1 year) based on the following categories:

- Permanent records (i.e., records that are essential): shall be retained and preserved indefinitely
- Current records (i.e., records for operational necessity, ready reference, convenience): record retention schedules may vary but generally less than 10 years
- Storage records (i.e., records retained offsite): record retentions may vary but generally less than 10 years

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

Raw Data: Maximum of 30 days	Data is retained for only as long as it takes to issue a citation, if needed, to a party responsible for illegal dumping.
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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):

- Data is not retained beyond the maximum stated retention period.

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

Data will be stored in the following location:

- ☒ Local storage
- ☒ Vendor managed storage
- ☐ Department of Technology Data Center
- ☒ Software as a Service Product
- ☒ Cloud Storage Provider

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

Practices: Raw Data is consolidated on the local hard drive and will be hard deleted after 30 days of captured data date by Department Internet Technology staff.

Department IT staff will use secure deletion method to overwrite file data.

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.

COMPLIANCE

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

Deputy Director for Operations, Director of Communications, and Assistant Superintendent of Street Environmental Services are responsible for monitoring compliance

Department shall assign the following personnel to oversee Policy compliance by the Department and third parties:

Deputy Director for Operations, Director of Communications, and Assistant Superintendent of Street Environmental Services

Sanctions for violations of this Policy include the following:

Removal or shutting down of technology for investigation by compliance staff named above until violations are resolved.

Sanctions for violations of this Policy include the following:

1. First offense: violator shall be verbally notified by Public Works management of nature of violation.
2. Second offense: violator shall be notified in writing of second offence and privileges to operate ALPR and PTZ technology shall be suspended for 60 days.
3. Third offense: (following reinstatement of operator privileges) violator shall be permanently banned from surveillance technology operations and disciplinary action may be taken depending upon the severity of second/third offences.

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 <u>not</u> 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

Public:

Complaints or concerns can be submitted to the Department by:

All complaints or concerns should be routed to the Public Works Director's Office at 628-271-3160 or dpw@sfdpw.org.

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

Department will respond to all comments or complaints within 10 business days.

City and County of San Francisco Employees:

All questions regarding this policy should be directed to the employee's supervisor or to the Public Works 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.