2018 Surveillance Impact Report

HAZARDOUS MATERIALS (HAZMAT) CAMERA

SEATTLE FIRE DEPARTMENT

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Seattle
Information Technology

CONTENTS

SURVEILLANCE IMPACT REPORT OVERVIEW

The Seattle City Council passed Ordinance 125376, also referred to as the "Surveillance Ordinance", on September 1, 2017. This Ordinance has implications for the acquisition of new technologies by the City, and technologies that are already in use that may fall under the new, broader definition of surveillance.

SMC 14.18.020.B.1 charges the City's Executive with developing a process to identify surveillance technologies subject to the Ordinance. Seattle IT, on behalf of the Executive, developed and implemented a process through which a privacy and surveillance review is completed prior to the acquisition of new technologies. This requirement, and the criteria used in the review process, are documented in Seattle IT Policy PR-02, the "Surveillance Policy".

HOW THIS DOCUMENT IS COMPLETED

As Seattle IT and department staff complete the document, they should keep the following in mind.

- Responses to questions should be in the text or check boxes only; all other information (questions, descriptions, etc.) should **NOT** be edited by the department staff completing this document.
- All content in this report will be available externally to the public. With this in mind, avoid using acronyms, slang, or other terms which may not be well-known to external audiences. Additionally, responses should be written using principally non-technical language to ensure they are accessible to audiences unfamiliar with the topic.

PRIVACY IMPACT ASSESSMENT

PURPOSE

A Privacy Impact Assessment ("PIA") is a method for collecting and documenting detailed information collected in order to conduct an in-depth privacy review of a program or project. A PIA asks questions about the collection, use, sharing, security and access controls for data that is gathered using a technology or program. It also requests information about policies, training and documentation that govern use of the technology. The PIA responses are used to determine privacy risks associated with a project and mitigations that may reduce some or all of those risks. In the interests of transparency about data collection and management, the City of Seattle has committed to publishing all PIAs on an outward facing website for public access.

WHEN IS A PRIVACY IMPACT ASSESSMENT REQUIRED?

A PIA may be required in two circumstances.
1) When a project, technology, or other review has been flagged as having a high privacy risk.
2) When a technology is required to complete the Surveillance Impact Report process. This is one deliverable that comprises the report.

1.0 ABSTRACT

1.1 Please provide a brief description (one paragraph) of the purpose and proposed use of the project/technology.

The Seattle Fire Department's Hazardous Materials (HazMat) specialty team, known as Unit 77, utilizes a camera system to explore incident scenes for potentially hazardous materials, spills, or contamination. First responders use Apple's Facetime, a video conferencing application, in conjunction with Apple TV to livestream video via an iPad and MiFi connection to a television monitor located on the HazMat Unit. The Facetime application also allows for screenshots to be taken for later review or dissemination to law enforcement as necessary.

Hazmat camera video is recorded for post-incident review and may be submitted to the appropriate law enforcement entity at an incident commander's discretion that there is reasonable suspicion of criminal activity.

1.2 Explain the reason the project/technology is being created or updated and why the PIA is required.

According to the Surveillance Ordinance, a technology has surveillance capability if it can be used "to collect, capture, transmit, or record data that could be used to surveil, regardless of whether the data is obscured, de-identified, or anonymized before or after collection and regardless of whether technology might be used to obscure or prevent the capturing of certain views or types of information."

First responders are often required to enter incident scenes at private residences or businesses, gaining access to potentially sensitive locations or encountering victims requiring emergency medical services ("EMS"). People in those residences or business may not be aware that first responders have been called or have entered the location. The camera system used during emergency responses involving the release of hazardous materials or contaminants could potentially capture images of identifiable individuals.

2.0 PROJECT / TECHNOLOGY OVERVIEW

Provide an overview of the project or technology. The overview gives the context and background necessary to understand the purpose, mission and justification for the project / technology proposed

2.1 Describe the benefits of the project/technology.

The technology allows first responders to detect and identify potentially hazardous materials or contaminants, all while maintaining a safe distance from potential exposure. Additionally, it provides an incident commander ("IC") with the real-time information required to make quick decisions.

Other incident personnel from the HAZMAT rig may also view the live video and assist with hazard and risk assessment during an emergency scenario. Once the contaminant has been properly identified, Unit 77, the team responsible for HAZMAT response, can then take the appropriate decontamination steps to mitigate the potential exposure and terminate the incident.

2.2 Provide any data or research demonstrating anticipated benefits.

The National Fire Protection Association's Standard 472 provides guidelines on Hazardous Materials/Weapons of Mass Destruction responses, including best practices and operating procedures for entering incident scenes. Each of these responses directly references the need to "analyze" a scene and safely determine the contaminant.

2.3 Describe the technology involved.

Hazmat cameras are operated on iPad. First responders use Apple's Facetime, a video conferencing application, in conjunction with Apple TV to livestream video via an iPad and MiFi connection to a television monitor located on the HazMat Unit.

2.4 Describe how the project or use of technology relates to the department's mission.

> The mission of the Seattle Fire Department is to save lives and protect property through emergency medical service, fire and rescue response and fire prevention. Unit 77's specific mission is the stabilization of all hazardous materials incidents that threaten public safety, except those incidents that are normally resolved by the Seattle Police Department's Explosives Disposal Unit. The Hazardous Materials Response Unit shall respond to any incident or ancillary function involving a hazardous materials spill, leak, explosion, or injury with immediate threat or potential threat to life, the environment or property.
>
> The technology's use for HazMat operations allows for quicker conveyance of information at an emergency scene and additional review by subject matter experts at the scene, thereby limiting potential exposure of first responders by allowing the information to be shared outside an exposure zone.

2.5 Who will be involved with the deployment and use of the project / technology?

> The Seattle Fire Department HazMat Team, Unit 77 is responsible for deployment and use of the technology.

3.0 USE GOVERNANCE

Provide an outline of any rules that will govern the use of the project / technology. Please note: non-City entities are bound by restrictions specified in the Surveillance Ordinance and Privacy Principles and must provide written procedures for how the entity will comply with any restrictions identified.

3.1 Describe the processes that are required prior to each use, or access to/ of the project / technology, such as a notification, or check-in, check-out of equipment.

> The two iPads and monitor are contained in a secure compartment located on the HazMat apparatus. Only Unit 77 members can access the compartment. The iPads and Mifi also require passwords known only to Unit 77 members. No check-out is required prior to use, only a login to the iPad and MiFi.
>
> Apparatus inventories are regularly conducted by SFD personnel at Station 10.

3.2 List the legal standards or conditions, if any, that must be met before the project / technology is used.
For example, the purposes of a criminal investigation are supported by reasonable suspicion.

> According to SMC 3.16.200 the Seattle Fire Department is designated as the Hazardous Materials Incident Command Agency for all hazardous materials incidents within the corporate limits of The City of Seattle. The Incident Commander has broad authority to use the technology during an incident response.

3.3 Describe the policies and training required of all personnel operating the project / technology, and who has access to ensure compliance with use and management policies.

In general, commanding officers, such as the acting Lieutenant and/or Captain, are responsible for ensuring compliance of uniformed personnel in their unit.

While the Department has strict policies around the use of personal devices, such as cameras and cell phones there are no policies specifically regarding the use of department-issued digital cameras, retention or transmission of photographs taken during HazMat responses.

The one exception is section 3004-7 of the Policies and Operating Guideline (POG) addressing the use of cameras for recording the mechanism of injury during EMS responses: "in accordance with OG 5001.2 Aid and Medic Responses, Digital Cameras, on-duty firefighter/paramedics may use digital cameras provided by the Department to record the mechanism of injury to trauma patients. After showing the photographs to appropriate hospital emergency department staff the photos will be deleted." This policy applies to photos taken of potential victims seen during HazMat responses.

4.0 DATA COLLECTION AND USE

Provide information about the policies and practices around the collection and use of the data collected.

4.1 Provide details about what information is being collected from sources other than an individual, including other IT systems, systems of record, commercial data aggregators, publicly available data and/or other city departments.

No information from other sources is collected by this technology.

4.2 What measures are in place to minimize inadvertent or improper collection of data?

The Department is working to develop a policy for the HazMat unit regarding the acceptable use of this technology during emergency responses, as well as the subsequent storage of photos and sharing with law enforcement agencies. However, there are strict policies regarding the use and deletion of photos if they include victims requiring emergency medical service (POG section 3004-7).

The iPads and monitor are in a locked compartment that only Unit 77 personnel can access. The iPads and Mifi are password-protected, which are only known to the HazMat unit.

4.3 How and when will the project / technology be deployed or used? By whom? Who will determine when the project / technology is deployed and used?

The technology is currently in use by SFD personnel on the HazMat team. The Unit 77 commanding officer or the IC will determine if the technology use is necessary during an incident response.

4.4 How often will the technology be in operation?

During HazMat responses as directed by the Unit 77 officer or IC. The technology was originally acquired in 2014. From 2014-2017, HAZ1 responded to an average of 50 incidents each year, although the technology is only used during a handful of these responses.

4.5 What is the permanence of the installation? Is it installed permanently, or temporarily?

Only the monitor has been permanently installment on the HazMat unit. The iPads are contained in a locked compartment on the unit, but can be removed for use during an incident.

4.6 Is a physical object collecting data or images visible to the public? What are the markings to indicate that it is in use? What signage is used to determine department ownership and contact information?

The TV monitor installed on the HazMat unit vehicle and may potentially be viewed by onlookers or the public. An awning was installed on the apparatus to provide some cover and block the view of non-SFD personnel. The iPads are clearly marked as SFD property and require a password to access.

4.7 How will data that is collected be accessed and by whom?
Please do not include staff names; roles or functions only.

Data is collected on scene by Unit 77 personnel and accessible by that team only. In the case of disclosure to law enforcement for litigation or in accordance with UHCIA, Unit 77 personnel will securely transmit the appropriate data and information after direction by either the Department's Public Disclosure Officer or the IC.

4.8 If operated or used by another entity on behalf of the City, provide details about access, and applicable protocols. Please link memorandums of agreement, contracts, etc. that are applicable.

The Department is working to develop a policy for the HazMat unit regarding the acceptable use of this technology during emergency responses, as well as the subsequent storage of photos and sharing with law enforcement agencies. However, there are strict policies regarding the use and deletion of photos if they include victims requiring emergency medical service (POG section 3004-7).

4.9 What are acceptable reasons for access to the equipment and/or data collected?

The following are considered acceptable reasons to access the equipment and/or the data collected.

- Hazardous Materials response, at the IC's discretion
- Public Records (some exemptions may apply)
- Discovery for litigation purposes
- Research by Unit 77 personnel
- Sharing of information with law enforcement in accordance with UHCIA

4.10 What safeguards are in place, for protecting data from unauthorized access (encryption, access control mechanisms, etc.) and to provide an audit trail (viewer logging, modification logging, etc.)?

Photos from HazMat responses are retained on a secured "O" drive, only accessible to members of Unit 77. A new policy will be developed to track and log all disclosures of Unit 77 records to law enforcement agencies.

Regarding FaceTime technology: Apple creates a unique ID for each FaceTime user, ensuring FaceTime calls are routed and connected properly. No other user information is stored for FaceTime and Apple cannot retrieve the data for any other purpose (it is stored in a hash format). No location information is ever used or stored during FaceTime registration or a FaceTime conversation. Additionally, the entire FaceTime conversation stream itself is encrypted. Source: http://www.zdnet.com/article/rumor-apple-capturing-information-on-facetime-calls-updated-with-apple-response/

Regarding use of iPad technology: iPad supports WPA2 Enterprise to provide authenticated access to your enterprise wireless network. WPA2 Enterprise uses 128-bit AES encryption, giving users the highest level of assurance that their data will remain protected when they send and receive communications over a Wi-Fi network connection. In addition to your existing infrastructure each FaceTime session is encrypted end to end with unique session keys. Apple creates a unique ID for each FaceTime user, ensuring FaceTime calls are routed and connected properly. Source: http://www.zdnet.com/article/facetime-calls-are-encrypted-and-hipaa-compliant-when-using-proper-encryption/

5.0 DATA STORAGE, RETENTION AND DELETION

5.1 How will data be securely stored?

Data is stored on the equipment itself and the Department's "O" drive, which is accessible only to Unit 77 personnel. It is deleted in accordance with the policies regarding the use and deletion of photos if they include victims requiring emergency medical service (POG section 3004-7).

The Department is working to develop an additional policy for the HazMat unit regarding the acceptable use of this technology during emergency responses, as well as the subsequent storage of photos and sharing with law enforcement agencies.

5.2 How will the owner allow for departmental and other entities, to audit for compliance with legal deletion requirements?

The Department is working to develop an additional policy for the HazMat unit regarding the acceptable use of this technology during emergency responses, as well as the subsequent storage of photos and sharing with law enforcement agencies.

At this time, the Unit 77 (HAZMAT) Captain at Seattle Fire Station 10 manages the data at a device level.

5.3 What measures will be used to destroy improperly collected data?

The Department is working to develop an additional policy for the HazMat unit regarding the acceptable use of this technology during emergency responses, as well as the subsequent storage of photos and sharing with law enforcement agencies.

Deletion of videos or pictures occurs in accordance with the Department's retention schedule occurs at a device level.

5.4 Which specific departmental unit or individual is responsible for ensuring compliance with data retention requirements?

The Department's Privacy Champion and Public Disclosure Officer is responsible for ensuring compliance with data retention requirements.

6.0 DATA SHARING AND ACCURACY

6.1 Which entity or entities inside and external to the City will be data sharing partners?

> In the event that an IC determines the resulting video should be shared with law enforcement for investigation and potential litigation, Unit 77 may share data with SPD's Arson & Bomb Squad (ABS) and Narcotics Unit and the Seattle branch of the Federal Bureau of Investigation (FBI). The Department is working to develop a 2018 policy update that addresses the how the data from this technology is shared.

6.2 Why is data sharing necessary?

> SFD personnel may encounter information at incident scenes that is evidence of unlawful activity. For example, a "meth lab" response where Unit 77 would enter the incident scene first to ensure the safety of the scene. Photos and video would then be shared with law enforcement partners as evidence of potential criminal activity.

6.3 Are there any restrictions on non-City data use?

Yes ☐ No ☒

> 6.3.1 If you answered Yes, provide a copy of the department's procedures and policies for ensuring compliance with these restrictions.

> N/A

6.4 How does the project/technology review and approve information sharing agreements, memorandums of understanding, new uses of the information, new access to the system by organizations within City of Seattle and outside agencies? Please describe the process for reviewing and updating data sharing agreements.

> The Department is working to develop a 2018 policy that addresses the use of this technology, photo retention, and sharing of records with law enforcement. With this policy the Department will develop Memorandum of Agreements with the Seattle branch of the FBI and Seattle Police Department.

6.5 Explain how the project/technology checks the accuracy of the information collected. If accuracy is not checked, please explain why.

> No specific measures are taken by SFD personnel to ensure the accuracy of the information collected. The Department is working to develop a policy that addresses the how the data from this technology is retained.

6.6 Describe any procedures that allow individuals to access their information and correct inaccurate or erroneous information.

This may be completed through the public disclosure process as defined in RCW 42.56.240(1).

7.0 LEGAL OBLIGATIONS, RISKS AND COMPLIANCE

7.1 What specific legal authorities and/or agreements permit and define the collection of information by the project/technology?

SMC 3.16.200 The Seattle Fire Department is designated as the Hazardous Materials Incident Command Agency for all hazardous materials incidents within the corporate limits of The City of Seattle. The Incident Commander has broad authority to use the technology during an incident response.

7.2 Describe what privacy training is provided to users either generally or specifically relevant to the project/technology.

The only privacy training provided is the City-wide privacy and security training. No privacy training specifically regarding the use of this technology has been provided to Unit 77 personnel. Unit 77 guidelines describes the best practice use of this technology during an incident response:

> "Turn on the iPads. Connect the entry team iPads to the entry team MiFi [a personal device that facilitates, and is used by SFD to, ensure secure wireless access] by clicking the 'Settings' icon on the iPad, then selecting 'Wi-Fi' from the icons on the left side of the screen. This will display a list of the available networks. Select the network that corresponds to the label on the lower left front of the entry team MiFi.

> Once this is done the iPads are connected to the internet through the Wi-Fi device and it is possible to access websites, send email, and initiate Facetime conversations. Facetime allows the near real time sharing of video and audio with another device.

> Due to the limited dexterity of the entry team, we should set up a Facetime conversation between one of the entry team iPads and the team leader iPad. Once the Facetime conversation is initiated, the iPad will transmit whatever the entry team sees and hears to the team leader iPad. The team leader can mirror his display on the big screen by "mirroring" the iPad display through the Apple TV. The team leader iPad can also capture screenshots of the video feed for later review as well as reach back."

The Department is working to develop a 2018 policy that addresses the use of this technology, photo retention, and sharing of records with law enforcement. Training for users will be included in this policy.

7.3 Given the specific data elements collected, describe the privacy risks identified and for each risk, explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.

Risk: Private occupancies or sensitive areas may be accessed by SFD personnel during an emergency response. Other records of the response, such as Computer-Aided Dispatch reports, could be then used in conjunction with this technology to identify individuals at an incident scene.

Mitigation: This risk is mitigated by way of data access controls. More specifically, the only people with access to the data Unit 77 personnel and the IC. Similarly, data stored on the "O Drive" can only be accessed by Unit 77 personnel.

7.4 Is there any aspect of the project/technology that might cause concern by giving the appearance to the public of privacy intrusion or misuse of personal information?

Sharing of incident records with law enforcement is likely cause of concern. SFD is working to develop a 2018 policy that addresses the sharing of records with law enforcement, to mitigate this concern.

Another concern would be protection of records associated with emergency medical services. SFD protects such records in accordance with RCW 70.02, which governs access and disclosure of healthcare information. Additionally, the Department is working to develop a 2018 policy that addresses sharing of records and photo retention.

8.0 MONITORING AND ENFORCEMENT

8.1 Describe how the project/technology maintains a record of any disclosures outside of the department.

The Department is working to develop a 2018 policy that addresses documentation and recording of sharing of records with law enforcement. Pictures of incident scenes are shared with the Seattle Police Department and the FBI's Seattle office via email. Direct communication between Unit 77 and law enforcement is not tracked or retained beyond regular email retention policy.

Disclosures to any other entities, including the public, are only authorized if processed and approved by the Department's Public Disclosure Officer. All disclosures are tracked in a log, which is regularly updated and retained on a secure server accessible only to select employees.

8.2 What auditing measures are in place to safeguard the information, and policies that pertain to them, as well as who has access to the audit data? Explain whether the project/technology conducts self-audits, third party audits or reviews.

At this time, there are no specific auditing measures in place for this technology. The Department will develop a 2018 policy on disclosure, tracking and retention of Unit 77 records and incorporate it into the Seattle Fire Departments Policies and Operating Guidelines (POG)

FINANCIAL INFORMATION

PURPOSE

This section provides a description of the fiscal impact of the surveillance technology, as required by the Surveillance Ordinance.

1.0 FISCAL IMPACT

Provide a description of the fiscal impact of the project/technology by answering the questions below.

1.1 Current or potential sources of funding: initial acquisition costs

Current ☒ Potential ☐

Date of Initial Acquisition	Date of Go Live	Direct Initial Acquisition Cost	Professional Services for Acquisition	Other Acquisition Costs	Initial Acquisition Funding Source
June 10, 2013	June 2013	$2,296.92 for two iPads and two MiFi secure access devices	N/A	N/A	Federal Port Security Grant 2010 (FPSG10)

Notes:

The iPads were purchased directly from Apple.

1.2 Current or potential sources of funding: on-going operating costs, including maintenance, licensing, personnel, legal/compliance use auditing, data retention and security costs.

Current ☒ Potential ☐

Annual Maintenance and Licensing	Legal/compliance, audit, data retention and other security costs	Department Overhead	IT Overhead	Annual Funding Source
$0.00	$0.00	$0.00	$0.00	N/A

Notes:

Grant-funded equipment purchase.

1.3 Cost savings potential through use of the technology

In an emergency setting, good communication is always critical. Pictures allow first responders to convey large amounts of information to hospital staff in a quick, efficient and accurate manner.

Early and accurate detection of hazardous materials can prevent the loss of property and life, including department personnel and the public.

1.4 Current or potential sources of funding including subsidies or free products offered by vendors or governmental entities

Funding for this technology comes from the Federal Port Security Grant (FPSG) Program administered by the Federal Emergency Management Agency (FEMA) and Department of Homeland Security (DHS): https://www.fema.gov/port-security-grant-program.

EXPERTISE AND REFERENCES

PURPOSE

The following information is provided to ensure that Council has a group of experts to reference while reviewing the completed Surveillance Impact Report ("SIR"). Any individuals or agencies referenced must be made aware ahead of publication that their information has been included. All materials must be available for Council to access or review, without requiring additional purchase or contract.

1.0 OTHER GOVERNMENT REFERENCES

Please list any other government bodies that have implemented this technology and can speak to the implementation of this technology.

Agency, Municipality, etc.	Primary Contact	Description of Current Use
Bellevue Fire Department	(425) 452-6892	Uses a similar system for HazMat responses.
South King Fire & Rescue	(253) 839-6234	Uses a similar system for HazMat responses.

2.0 ACADEMICS, CONSULTANTS, AND OTHER EXPERTS

Please list any experts in the technology under consideration, or in the technical completion of the service or function the technology is responsible for.

Agency, Municipality, etc.	Primary Contact	Description of Current Use
National Fire Protection Association (NFPA)	Secretary, Standards Council. 1 Batterymarch Park P.O. Box 9101 Quincy, MA 02269-9101; email: stds_admin@nfpa.org	NFPA 472 – Hazardous Materials / Weapons of Mass Destruction Response Handbook

3.0 WHITE PAPERS OR OTHER DOCUMENTS

Please list any authoritative publication, report or guide that is relevant to the use of this technology or this type of technology.

Title	Publication	Link
N/A		

RACIAL EQUITY TOOLKIT AND ENGAGEMENT FOR PUBLIC COMMENT WORKSHEET

PURPOSE

Departments submitting a SIR are required to complete an adapted version of the Racial Equity Toolkit ("RET").

1. To provide a framework for the mindful completion of the Surveillance Impact Reports in a way that is sensitive to the historic exclusion of vulnerable and historically underrepresented communities. Particularly, to inform the public engagement efforts Departments will complete as part of the Surveillance Impact Report.
2. To highlight and mitigate any impacts on racial equity from the adoption and the use of the technology.
3. To highlight and mitigate any disparate impacts on individuals or vulnerable communities.
4. To fulfill the public engagement requirements of the Surveillance Impact Report.

ADAPTION OF THE RET FOR SURVEILLANCE IMPACT REPORTS

The RET was adapted for the specific use by the Seattle Information Technology Departments' ("Seattle IT") Privacy Team, the Office of Civil Rights ("OCR"), and Change Team members from Seattle IT, Seattle City Light, Seattle Fire Department, Seattle Police Department, and Seattle Department of Transportation.

RACIAL EQUITY TOOLKIT OVERVIEW

RACIAL EQUITY TOOLKIT: TO ASSESS POLICIES, INITIATIVES, PROGRAMS, AND BUDGET ISSUES
The vision of the Seattle Race and Social Justice Initiative is to eliminate racial inequity in the community. To do this requires ending individual racism, institutional racism and structural racism. The Racial Equity Toolkit lays out a process and a set of questions to guide the development, implementation and evaluation of policies, initiatives, programs, and budget issues to address the impacts on racial equity.

WHEN DO I USE THIS TOOLKIT?

Early. Apply the toolkit early for alignment with departmental racial equity goals and desired outcomes.

HOW DO I USE THIS TOOLKIT?

With inclusion. The analysis should be completed by people with different racial perspectives.

Step by step. The Racial Equity Analysis is made up of six steps from beginning to completion:

Please refer to the following resources available on the Office of Civil Rights' website here: Creating effective community outcomes; Identifying stakeholders & listening to communities of color; Data resources

1.0 SET OUTCOMES

1.1. Seattle City council has defined the following inclusion criteria in the surveillance ordinance, and they serve as important touchstones for the risks departments are being asked to resolve and/or mitigate. Which of the following inclusion criteria apply to this technology?

☐ The technology disparately impacts disadvantaged groups.

☐ There is a high likelihood that personally identifiable information will be shared with non-City entities that will use the data for a purpose other than providing the City with a contractually agreed-upon service.

☒ The technology collects data that is personally identifiable even if obscured, de-identified, or anonymized after collection.

☐ The technology raises reasonable concerns about impacts to civil liberty, freedom of speech or association, racial equity, or social justice.

1.2 What are the potential impacts on civil liberties through the implementation of this technology?

> Some personally identifiable information (PII) gathered during emergency responses could be used to identify individuals, such as their name, home address or contact information. Medical privacy is particularly relevant in the case of pictures taken during medical emergencies. Victims of criminal activity may also be identified during incident responses, whose identities should be protected in accordance with RCW 42.56.240 and RCW 70.02.

1.3 What does your department define as the most important racially equitable community outcomes related to the implementation of this technology?

> The Seattle Fire Department is committed to equitable service delivery regardless of race, sexual orientation, income, immigration or refugee status. All individuals, including non-residents and visitors to the City will be treated with compassion, professionalism and respect by SFD personnel.

1.4 What racial equity opportunity area(s) will be affected by the application of the technology?

☐ Education	☒ Criminal Justice
☐ Community Development	☐ Jobs
☒ Health	☒ Housing
☒ Environment	☐ Other

1.5 Are there impacts on:

☐ Contracting Equity	☐ Inclusive Outreach and Public Engagement
☐ Workforce Equity	☐ Other
☒ Immigrant and Refugee Access to Services	

If Other, please describe

N/A

2.0 INVOLVE STAKEHOLDERS, ANALYZE DATA

2.1 Departmental conclusions about potential neighborhood impacts of the technology. Are the impacts on geographic areas? ☐ Yes ☒ No

Check all neighborhoods that apply *(see map of neighborhood boundaries in Appendix A: Glossary, under "Seattle Neighborhoods"):*

☒ All Seattle neighborhoods

      ☐ Ballard   ☐ Southeast

      ☐ North   ☐ Delridge

      ☐ Northeast   ☐ Greater Duwamish

      ☐ Central   ☐ East District

      ☐ Lake Union   ☐ King County (outside Seattle)

      ☐ Southwest

☐ Outside King County. Please describe:

N/A

2.2 What are the racial demographics of those living in the area or impacted by the issue? *(see Stakeholder and Data Resources* here*.)*

City of Seattle demographics: White - 69.5%; Black or African American - 7.9%; Amer. Indian & Alaska Native - 0.8%; Asian - 13.8%; Native Hawaiian & Pacific Islander - 0.4; Other race - 2.4%; Two or more races - 5.1%; Hispanic or Latino ethnicity (of any race): 6.6%; Persons of color: 33.7%.   King County demographics: White – 70.1%; Black or African American – 6.7%; American Indian & Alaskan Native – 1.1%; Asian, Native Hawaiian, Pacific Islander – 17.2%; Hispanic or Latino (of any race) – 9.4%

STOP: Department should complete RET questions 2.3 – 6 and Appendices B-I AFTER completing their public comment and engagement requirements.

2.3 Have you completed the following steps to engage the public? If you have not completed these steps, pause here until public outreach and engagement has been completed. (*See OCR's RET worksheet* here *for more information about engaging the public at this point in the process to ensure their concerns and expertise are part of analysis.*)

☐ **Create a public outreach plan.** Residents, community leaders, and the public were informed of the public meeting and feedback options via:

     ☐ Email
     ☐ Mailings
     ☐ Fliers
     ☐ Phone calls
     ☐ Social media
     ☐ Other

☐ The following community leaders were identified and invited to the public meeting(s):

     ☐ American Civil Liberties Union (ACLU)
     ☐ CARE
     ☐ Northwest Immigrant Rights
     ☐ OneAmerica
     ☐ JACL
     ☐ For Seattle Police Department only, Community Police Commissions
     ☐ Other:

> [Please describe]

☐ **Engagement for Public Comment #1**

    Date of meeting: [Respond here.]

    Location of meeting: [Respond here.]

    Summary of discussion:

> [Respond here, if applicable.]

    ☐ Full meeting transcript, including City attendees, community leaders in attendance, and attendee demographic data, is attached as an appendix to the SIR

☐ **Engagement for Public Comment #2**

    Date of meeting: [Respond here.]

    Location of meeting: [Respond here.]

    Summary of discussion:

> [Respond here, if applicable.]

    ☐ Full meeting transcript, including City attendees, community leaders in attendance, and attendee demographic data, is attached as an appendix to the SIR

☐ **Engagement for Public Comment #3 (if applicable)**

    Date of meeting: [Respond here.]

    Location of meeting: [Respond here.]

Summary of discussion:

[Respond here, if applicable.]

☐ Full meeting transcript, including City attendees, community leaders in attendance, and attendee demographic data, is attached as an appendix to the SIR

☐ **Collect public feedback via mail and email**

Number of feedback submissions received: [Respond here.]

Summary of feedback: [Respond here.]

Open comment period: [Respond here.]

☐ Complete compilation of feedback is attached an as an appendix to the SIR

☐ **Community Technology Advisory Board (CTAB) Presentation**

Date of presentation: [Respond here,]

Summary of comments:

[Respond here.]

☐ Complete meeting minutes and comments are attached an as an appendix to the SIR
☐ Any letters of feedback by CTAB members are attached as an appendix to the SIR

2.4 What does data and conversations with stakeholders tell you about existing racial inequities that influence people's lives and should be taken into consideration when applying/implementing/using the technology? *(See OCR's RET worksheet here for more information; King County Opportunity Maps are a good resource for information based on geography, race, and income.)*

[Respond to question 2.4here.]

2.5 What are the root causes or factors creating these racial inequities? Mitigation strategies will be addressed in 4.1 and 5.3. *Examples: bias in process; lack of access or barriers; lack of racially inclusive engagement.*

[Respond to question 2.5 here.]

3.0 DETERMINE BENEFIT AND/OR BURDEN

Provide a description of any potential disparate impact of surveillance on civil rights and liberties on communities of color and other marginalized communities. Given what you have learned from data and from stakeholder involvement…

3.1 How will the technology, or use of the technology increase or decrease racial equity? What are potential unintended consequences? What benefits may result? Are the impacts aligned with your department's community outcomes that were defined in 1.0?

[Respond to question 3.1 here.]

3.2 What benefits to the impacted community/demographic may result?

[Respond to question 3.1 here.]

3.3 What are potential unintended consequences (both negative and positive potential impact)?

[Respond to question 3.1 here.]

3.4 Are the impacts aligned with your department's community outcomes that were defined in Step 1.0?

[Respond to question 3.1 here.]

4.0 ADVANCE OPPORTUNITY OR MINIMIZE HARM

Provide a mitigation plan for the impacts described in step 3.

4.1 How will you address the impacts (including unintended consequences) on racial equity? What strategies address immediate impacts? What strategies address root causes of inequity listed in 2.5? How will you partner with stakeholders for long-term positive change? If impacts are not aligned with desired community outcomes for surveillance technology (see 1a), how will you re-align your work?

Program Strategies:

[Respond here.]

Policy Strategies:

[Respond here.]

Partnership Strategies:

[Respond here.]

5.0 EVALUATE, RAISE RACIAL AWARENESS, BE ACCOUNTABLE

The following information must be provided to the CTO, via the Privacy Office, on an annual basis for the purposes of an annual report to the City Council on the equitable use of surveillance technology. For Seattle Police Department, the equity impact assessments may be prepared by the Inspector General for Public Safety.

The following information does not need to be completed in the SIR submitted to Council, unless this is a retroactive review.

5.1 Which neighborhoods were impacted/targeted by the technology over the past year and how many people in each neighborhood were impacted?
☐   All Seattle neighborhoods
☐   Ballard
☐   North
☐   NE
☐   Central
☐   Lake Union
☐   Southwest
☐   Southeast
☐   Greater Duwamish
☐   East District
☐   King County (outside Seattle)
☐   Outside King County. Please describe:

[Respond here, if applicable.]

5.2 Demographic information of people impacted/targeted by the technology over the past year…

To the best of the department's ability, provide demographic information of the persons surveilled by this technology. If any of the neighborhoods above were included, compare the surveilled demographics to the neighborhood averages and City averages.

[Respond to question 5.2 here.]

5.3 Which of the mitigation strategies that you identified in Step 4 were implemented in the past year? Specifically, what adjustments to laws and policies should be made to remedy any disproportionate impacts so as to achieve a more equitable outcome in the future.

Type of Strategy (program, policy, partnership)	Description of Strategy	Percent complete of implementation	Describe successes and challenges with strategy implementation

5.4 How have you involved stakeholders since the implementation/application of the technology began?

☐   Public Meeting(s)
☐   CTAB Presentation
☐   Postings to Privacy webpage seattle.gov/privacy
☐   Other external communications
☐   Stakeholders have not been involved since the implementation/application

5.5 What is unresolved? What resources/partnerships do you still need to make changes?

[Respond to question 5.5 here.]

6.0 REPORT BACK

Responses to Step 5 will be compiled and analyzed as part of the CTO's Annual Report on Equitable Use of Surveillance Technology.

Departments will be responsible for sharing their own evaluations with department leadership, Change Team Leads, and community leaders identified in the public outreach plan (Step 2c).

PRIVACY AND CIVIL LIBERTIES ASSESSMENT

PURPOSE

This section shall be completed after public engagement has concluded and the department has completed the Racial Equity Toolkit section above. The Privacy and Civil Liberties Assessment is completed by the Community Surveillance Working Group ("Working Group"), per the Surveillance Ordinance which states that the Working Group shall:

> *"[p]rovide to the Executive and the City Council a privacy and civil liberties impact assessment for each SIR that must be included with any departmental request for surveillance technology acquisition or in-use approval. The impact assessment shall include a description of the potential impact of the surveillance technology on civil rights and liberties and potential disparate impacts on communities of color and other marginalized communities. The CTO shall share with the Working Group a copy of the SIR that shall also be posted during the period of public engagement. At the conclusion of the public engagement period, the CTO shall share the final proposed SIR with the Working Group at least six weeks prior to submittal of the SIR to Council for approval. The Working Group shall provide its impact assessment in writing to the Executive and the City Council for inclusion in the SIR within six weeks of receiving the final proposed SIR. If the Working Group does not provide the impact assessment before such time, the Working Group must ask for a two-week extension of time to City Council in writing. If the Working Group fails to submit an impact statement within eight weeks of receiving the SIR, the department and City Council may proceed with ordinance approval without the impact statement."*

WORKING GROUP PRIVACY AND CIVIL LIBERTIES ASSESSMENT

[Assessment to be placed here.]

APPENDIX A: GLOSSARY

Accountable: (Taken from the Racial Equity Toolkit.) Responsive to the needs and concerns of those most impacted by the issues you are working on, particularly to communities of color and those historically underrepresented in the civic process.

Community Outcomes: (Taken from the Racial Equity Toolkit.) The specific result you are seeking to achieve that advances racial equity.

Contracting Equity: (Taken from the Racial Equity Toolkit.) Efforts to achieve equitable racial outcomes in the way the City spends resources, including goods and services, consultants and contracting.

DON: "Department of Neighborhoods."

IC: "Incident Commander"

Immigrant and Refugee Access to Services: (Taken from the Racial Equity Toolkit.) Government services and resources are easily available and understandable to all Seattle residents, including non-native English speakers. Full and active participation of immigrant and refugee communities exists in Seattle's civic, economic and cultural life.

Inclusive Outreach and Public Engagement: (Taken from the Racial Equity Toolkit.) Processes inclusive of people of diverse races, cultures, gender identities, sexual orientations and socio-economic status. Access to information, resources and civic processes so community members can effectively engage in the design and delivery of public services.

Individual Racism: (Taken from the Racial Equity Toolkit.) Pre-judgment, bias, stereotypes about an individual or group based on race. The impacts of racism on individuals including white people internalizing privilege, and people of color internalizing oppression.

Institutional Racism: (Taken from the Racial Equity Toolkit.) Organizational programs, policies or procedures that work to the benefit of white people and to the detriment of people of color, usually unintentionally or inadvertently.

OCR: "Office of Arts and Culture."

Opportunity Areas: (Taken from the Racial Equity Toolkit.) One of seven issue areas the City of Seattle is working on in partnership with the community to eliminate racial disparities and create racial equity. They include: Education, Health, Community Development, Criminal Justice, Jobs, Housing, and the Environment.

Racial Equity: (Taken from the Racial Equity Toolkit.) When social, economic and political opportunities are not predicted based upon a person's race.

Racial Inequity: (Taken from the Racial Equity Toolkit.) When a person's race can predict their social, economic, and political opportunities and outcomes.

RET: "Racial Equity Toolkit"

Seattle Neighborhoods: (Taken from the Racial Equity Toolkit Neighborhood.) Boundaries defined for the purpose of understanding geographic areas in Seattle.

SFD: "Seattle Fire Department"

SIR: "Surveillance Impact Report", a document which captures the fulfillment of the Council-defined Surveillance technology review process, as required by Ordinance 125376.

Stakeholders: (Taken from the Racial Equity Toolkit.) Those impacted by proposed policy, program, or budget issue who have potential concerns or issue expertise. Examples might include: specific racial/ethnic groups, other institutions like Seattle Housing Authority, schools, community-based organizations, Change Teams, City employees, unions, etc.

Structural Racism: (Taken from the Racial Equity Toolkit.) The interplay of policies, practices and programs of multiple institutions which leads to adverse outcomes and conditions for communities of color compared to white communities that occurs within the context of racialized historical and cultural conditions.

Surveillance Ordinance: Seattle City Council passed Ordinance 125376, also referred to as the "Surveillance Ordinance."

Unit 77: the Seattle Fire Department team responsible for HAZMAT response.

Workforce Equity: (Taken from the Racial Equity Toolkit.) Ensure the City's workforce diversity reflects the diversity of Seattle.
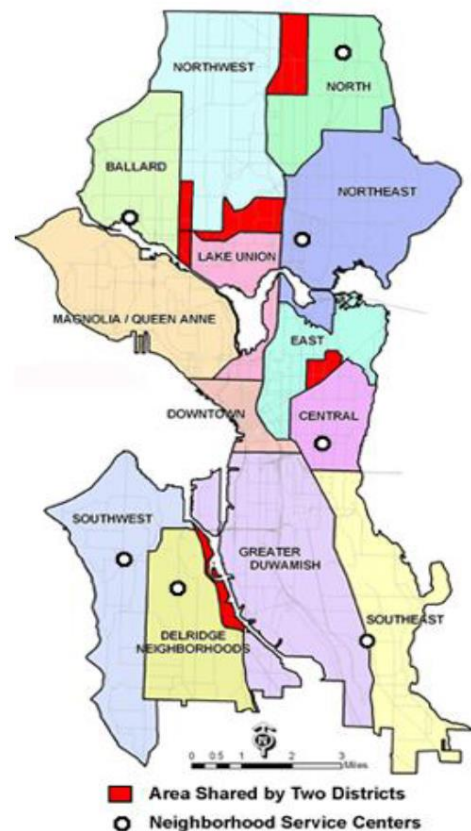
APPENDIX B: PUBLIC COMMENT DEMOGRAPHICS AND OVERVIEW

APPENDIX C: PUBLIC MEETING NOTICE(S)

APPENDIX D: MEETING SIGN-IN SHEET(S)

APPENDIX E: MEETING TRANSCRIPT(S)

APPENDIX F: LETTERS FROM ORGANIZATIONS

APPENDIX H: EMAILS FROM THE PUBLIC

APPENDIX I: LETTERS FROM THE PUBLIC