



**Seattle Office of
Inspector General**



**Seattle Office of
City Auditor**

January 27, 2020

To: Seattle City Council
From: Lisa Judge, Inspector General for Public Safety
David G. Jones, City Auditor *ooa*
Re: Annual Surveillance Usage Review for 2018

A handwritten signature in black ink, appearing to be 'LJ' or similar initials.

The Seattle Office of Inspector General for Public Safety (OIG) and Seattle Office of City Auditor (OCA) jointly submit this letter to fulfill the requirements of Seattle Ordinance 125376 as amended by Ordinance 125679.

In August 2017, the Seattle City Council (Council) updated Chapter 14.18 of the Seattle Municipal Code which regulates the City's acquisition and use of surveillance technologies. According to Chapter 14.18, "...any City department intending to acquire surveillance technology shall, prior to acquisition, obtain Council ordinance approval of the acquisition and a surveillance impact report for the technology."¹

Generally, each Surveillance Impact Report (SIR) must contain the following information:²

- A description of the surveillance technology to be acquired and a description of its general capabilities;
- A description of the purpose and proposed use of the surveillance technology;
- A clear use and data management policy;
- A description of any community engagement held and any future community engagement plans about the technology;
- A description of the potential impact of the surveillance on civil rights and liberties, and how potential disparate impacts on communities of color and

¹ [Seattle Municipal Code 14.18.020](#)

² [Seattle Municipal Code 14.18.040](#)

other marginalized communities have been taken into account; and a mitigation plan; and

- A description of the fiscal impact of the surveillance technology.

According to the Seattle Municipal Code, “the Inspector General for Public Safety in regard to [the Seattle Police Department] and the City Auditor in regard to all other departments should conduct an annual review of the City’s use of Surveillance technology and the extent to which departments are in compliance with the requirements of this Chapter 14.18 and with the terms of approved SIRs.”³ This requirement is detailed in Ordinance 125679 which amended Section 5 of Ordinance 125376 to state that the “first annual surveillance usage review under Section 14.18.060 of the Seattle Municipal Code should be filed in January of 2020 and cover activities through the end of 2018. Surveillance usage reviews in subsequent years shall be filed in September and cover the data and activities of the previous year.” Ordinance 125679 also established the Community Surveillance Working Group, but the group did not meet in 2018.⁴

OIG and OCA have been monitoring Chapter 14.18 activities by City of Seattle departments, the Community Surveillance Working Group, and the Council. In accordance with the requirements of the chapter, the Chief Technology Officer (CTO) first submitted a Master List of Surveillance Technologies to the Council on November 30, 2017 which included 28 technologies and was later revised in 2019 to add one additional technology.⁵

Per the chapter requirements for community meetings with opportunity for public comment and written response, the public comment period for the first group of SIRs was open from October 8 through November 5, 2018, and it was conducted through five community meetings, an online survey, email, and traditional mail. No completed SIRs were submitted to Council in 2018 and the Council did not approve any SIRs that year. Consequently, there were no Council-approved surveillance technologies in 2018 for OIG or OCA to review. As required by Section 14.18.020 of

³ [Seattle Municipal Code 14.18.060](#) (Ibid)

⁴ The Community Surveillance Working Group was created to “advise the Council and Executive on matters of surveillance technology from a community perspective.” It consists of seven members, with four appointed by the Mayor and three by the Council.

⁵ [Master List of Surveillance Technologies](#) and [Master List of Surveillance Technologies \(May 2019 revision\)](#)

the chapter, the CTO did file four quarterly reports in 2018. There were no additional surveillance technologies or projects identified in the reports.

OIG and OCA continue to monitor the SIR process. OIG and OCA are in the process of coordinating to ensure that both offices use a consistent methodology when evaluating the Seattle Police Department's and other departments' compliance with Chapter 14.18 and the terms of approved SIRs.