2026

Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report

Seattle Information Technology

Purpose

The purpose of the Equity Impact Assessment is to provide analysis about whether the Surveillance Ordinance is meeting its goals and to provide recommendations about changes, adjustments, or new approaches to meet its stated objectives. The Ordinance language defines this required report is as follows:

> *Every year, beginning by no later than September 15, 2019, and continuing by no later than September 15 each year thereafter, the Chief Technology Officer shall produce and submit to the City Council a Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report ("equity impact assessment"), to be filed with the City Clerk with an electronic copy to the Council, the Chair of the committee responsible for technology matters, the co-chairs of the Working Group, the City Auditor, the Inspector General for Public Safety, and the Director of Central Staff, and posted to the City's website.*
>
> *The equity impact assessment shall address, at a minimum, the following:*
> *Whether this Chapter 14.18 is effectively meeting the goals of the Race and Social Justice Initiative, including whether any communities and groups in the City are disproportionately impacted by the use of surveillance technologies;*
> *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; and*
> *Any new approaches and considerations the City Council should bring to future reviews of requests for Council approval submitted pursuant to Section 14.18.030.*
> *B. The CTO shall consult with the co-chairs of the Working Group in the writing of the equity impact assessment and shall include all Working Group feedback and recommendations in the equity impact assessment; if the CTO disagrees with a recommendation, the CTO shall provide an explanation of the disagreement in the report.*

Report Organization

This report is organized into six sections:

1. **Ordinance Background**
2. **Community Surveillance Working Group**
3. **RSJI Goals and Community Impact**
4. **Recommended Policy and Legal Adjustments**
5. **City Council Considerations for Future Reviews**
6. **Equity Reports for Technologies on the Master List**

Background

The Surveillance Ordinance

The Seattle City Council passed SMC 14.18, known as the "Surveillance Ordinance," to provide greater transparency to City Council and the public when the City acquires technology that meets the City's

definition of surveillance. The Surveillance Ordinance, which took effect in September 2017, outlines requirements that include surveillance technology review and approval by City Council before acquisition for new technologies; Council review and approval via ordinance for existing technologies; and reporting about surveillance technology use and community impact. The Surveillance Ordinance is meant to protect the information of vulnerable populations who may not understand how information they give to the City could be used. The American Civil Liberties Union and the Seattle Privacy Coalition are active partners in this effort.

Master List of Surveillance Technologies

The original master list was submitted to Council and the City Clerk on November 30, 2017. Per SMC 14.18.050.B. Section 3, "the CTO may make corrections to the master list, which must be timely filed with the City Clerk." The Master List of Surveillance Technologies has been updated over the last eight years with the most recent update filed on September 15, 2025 (Clerk File 323526). As of September 2026, the following departments currently use surveillance technology and have completed the appropriate approval processes for their technologies as required by the Surveillance Ordinance.

Department	Number of Technologies
Seattle Department of Transportation	1
Seattle Police Department	13
Total	14

Surveillance Impact Report (SIR) Status

- **Retroactive Technologies**: From 2019 to 2024, the original 28 retroactive technologies identified on the initial Master List of Surveillance Technologies completed the SIR process with the City Council. In September 2024, the Master List was updated to reflect technology deprecations and a re-factoring of technologies on the list based upon a more current and application of the criteria defined in the City's Surveillance Policy (POL-203).

- **Material Update Process**: The Surveillance Ordinance requires any material update to a Surveillance Impact Report, such as to change the purpose or manner in which a surveillance technology may be used, shall be by ordinance. To date, five SIR Council Bills previously passed by the City Council have gone through the material update process.

    1) Council Bill 120053 (Seattle Police Department Forward Looking Infrared Real-Time (FLIR) Video) originally passed on May 24, 2021, completed the material update process, with the City Council passing new Council Bill 120518 on March 14, 2023.
    2) Council Bill 120025 (Seattle Police Department Automated License Plate Reader technology) originally passed on April 19, 2021, completed the material update process, with the City Council passing new Council Bill 120778 on June 18, 2024.
    3) Council Bill 120504 (Seattle Police Department Tracking Devices) originally passed on February 28, 2023, completed the material update process, with City Council passing new Council Bill 120994 on June 17, 2025.

4) Council Bill 120844 (Seattle Police Department Closed-Circuit Television Camera Systems) originally passed on October 8, 2024, completed the material update process, with City Council passing new Council Bill 121052 on September 9, 2025.
5) Council Bill 120845 (Seattle Police Department Real-Time Crime Center software) originally passed on October 8, 2024, completed the material update process, with City Council passing new Council Bill 121053 on September 9, 2025.

- **2026 Surveillance Technologies Under Review**: The Seattle Fire Department (SFD) is currently going through the SIR process for the Emergency Response Aerial Technology. SFD is looking to add new technology to its specialized fleet of response apparatus and are proposing to use up to three Emergency Response Aerial Technology (ERAT) to assist SFD with specific and limited types of fire, medical, and rescue responses. The ERAT will provide an aerial perspective to assist SFD's incident command with rapid decision making to ensure public safety, firefighter safety, and protect property. The Seattle Fire Department is working with Seattle IT and the Mayor's Office in completing the SIR process and transmitting the final SIR and corresponding legislation in 2026.

Community Surveillance Working Group

The Community Surveillance Working Group is defined by 14.18.080. The Working Group's website is https://seattle.gov/surveillance-advisory-working-group. From January to August 2026, no new technology determined to be surveillance technology required a surveillance impact report to be reviewed by the Working Group. As a result, the Working Group's consultation in preparing a privacy and civil liberties impact assessment for a surveillance technology has not occurred as of August 31, 2026. However, as the SIR process continues in 2026 for SFD's Emergency Response Aerial Technology, the Working Group will be asked to draft a privacy and civil liberties impact assessment for the Emergency Response Aerial Technology which will be included in the final SIR.

Seattle IT is working with the Mayor's Office, Office for Civil Rights, and the City Council to interview and fill the vacant positions on the Working Group. The Mayor's Office has expressed interest in seeking feedback and recommendations from the Working Group regarding surveillance technologies. The feedback by the Working Group after the September 15 filing of this annual report will be filed as an addendum to the 2026 Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report at a later date.

RSJI Goals and Community Impact

> *Whether this Chapter 14.18 is effectively meeting the goals of the Race and Social Justice Initiative, including whether any communities and groups in the City are disproportionately impacted by the use of surveillance technologies.*

Please consult staff's previous Equity Impact Assessment reports describing the RSJI review methodology in the SIR process, public engagement, and effects of implementation of the Surveillance Ordinance.

- Clerk File 323525 - Seattle Information Technology 2025 Surveillance Technology Community Equity Impact and Assessment Policy Guidance Report
- Clerk File 323175 - Seattle Information Technology 2024 Surveillance Technology Community Equity Impact and Assessment Policy Guidance Report
- Clerk File 322804 - Seattle Information Technology 2023 Surveillance Technology Community Equity Impact and Assessment Policy Guidance Report
- Clerk File 322426 - Seattle Information Technology 2022 Surveillance Technology Community Equity Impact and Assessment Policy Guidance Report
- Clerk File 322100 - Seattle Information Technology 2021 Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report
- Clerk File 321784 - Seattle Information Technology 2020 Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report
- Clerk File 321423 - Seattle Information Technology 2019 Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report

Seattle IT's determination is that Chapter 14.18 contributes to meeting the goals of the City's Race and Social Justice Initiative. The vision of the Seattle Race and Social Justice Initiative ("RSJI") is to eliminate racial inequity in the community. To do this requires ending individual racism, institutional racism, and structural racism. The Surveillance Impact Report's Racial Equity Toolkit ("RET") provides a framework for answering questions in a way that is sensitive to the historic exclusion of vulnerable and historically underrepresented communities, fulfilling the public engagement requirements, highlighting any impacts on racial equity from the adoption and use of the technology, and mitigating any disparate impacts on individuals or vulnerable communities.

In 2026, one Racial Equity Toolkit was prepared by the Seattle Fire Department as they go through the SIR process for the Emergency Response Aerial Technology. The RET for the Emergency Response Aerial Technology starts on page 28 in the draft SIR document.

Recommended Policy and Legal Adjustments

> *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.*

After nine years of continued compliance efforts relating to the Surveillance Ordinance, Seattle IT and stakeholder departments have a better understanding of potential improvements to the surveillance approval process and associated policies that would increase efficiency and the public benefits of the law. With emerging technologies like forms of artificial intelligence, new technology requests from departments, and engagement with stakeholders and researchers, Seattle IT welcomes the opportunity to work with the Mayor's Office, City Council, and the Community Surveillance Working Group to reexamine and reimagine the surveillance ordinance. Please consult the 2025 report to see those previous recommendations.

Furthermore, with upcoming reports due back to the Mayor's Office over the next couple of months (e.g., NYU Policing Project Audit, Mayor's Office Internal Technical Review, and Office of Inspector General for Public Safety (OIG) Review), we will work with the Mayor's Office to file an addendum to this 2026 Surveillance Technology Community Equity Impact Assessment and Policy Guidance Report at a later date if adjustments to laws and policies are officially proposed.

City Council Considerations for Future Reviews

Any new approaches and considerations the City Council should bring to future reviews of requests for Council approval submitted pursuant to Section 14.18.030.

Seattle IT does not have any new approaches or considerations to share pursuant to Section 14.18.030 in this year's report.

Equity Reporting for Technologies on the Master List

Ordinance amendments have mandated that departments are responsible for providing equity metrics to ITD for evaluation. It is important to note that departments are struggling to resource and operationalize equity data collection due to staffing and/or technical limitations of the tools. The technologies themselves are often not designed to collect the data that informs or enables measurement of equity impacts.

The following reporting from departments are only for SIR technologies listed on the most recent Master List of Surveillance Technologies, Revised September 2025.

Seattle Department of Transportation:

Closed Circuit Television Equipment "Traffic Cameras"

The Seattle Department of Transportation (SDOT) operates 386 Closed Circuit Television (CCTV) traffic cameras across the city as of August 25, 2026. These cameras are used by SDOT for traffic monitoring and management purposes.

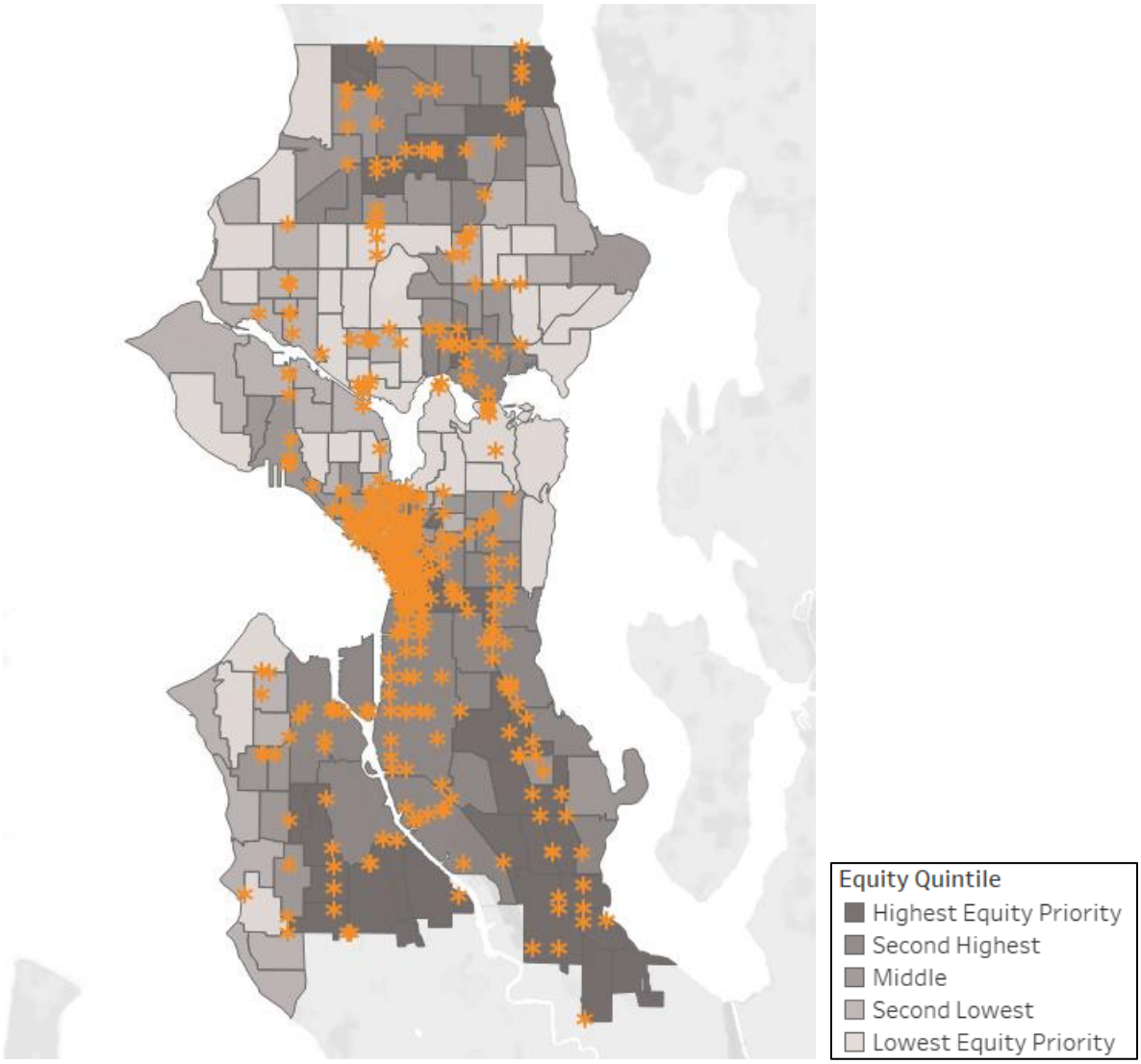
SDOT prioritizes the installation and maintenance of CCTV traffic cameras to increase SDOT's ability to provide comprehensive traffic monitoring and incident management. This equity impact assessment considers four metrics:

- Cameras per arterial lane mile
- Cameras per mile of the Frequent Transit Network (FTN)
- Cameras per mile of Priority Transit Investment Corridors (as defined in the Seattle Transportation Plan)
- Cameras per mile of the High Injury Network

To assess the degree to which the department can provide equitable services using our CCTV network, we leveraged the Racial and Social Equity Index GIS layer developed by the Seattle Office of Planning and Community Development. This layer combines a variety of demographic factors such as race, socioeconomics, and community health to assign each census tract an indexed priority score from 0-100. For the sake of analysis, we group the census tracts into quintiles: Highest Equity Priority (most historically disadvantaged), Second Highest, Middle, Second Lowest, and Lowest Equity Priority (least historically disadvantaged).

Fig. 1

Citywide SDOT CCTV Camera Distribution



The following charts show the equity quintile distribution for each of the metrics listed above:

Fig. 2

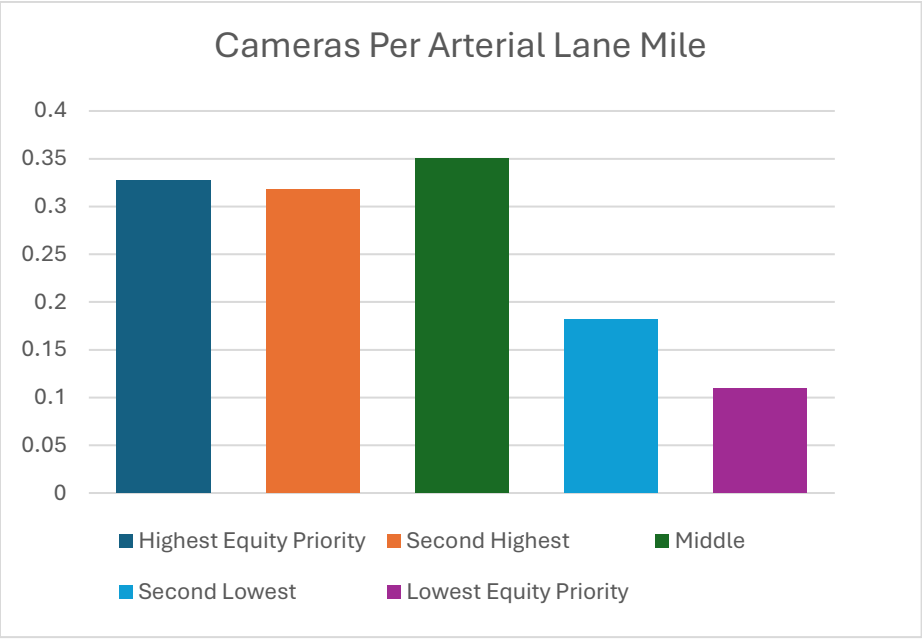
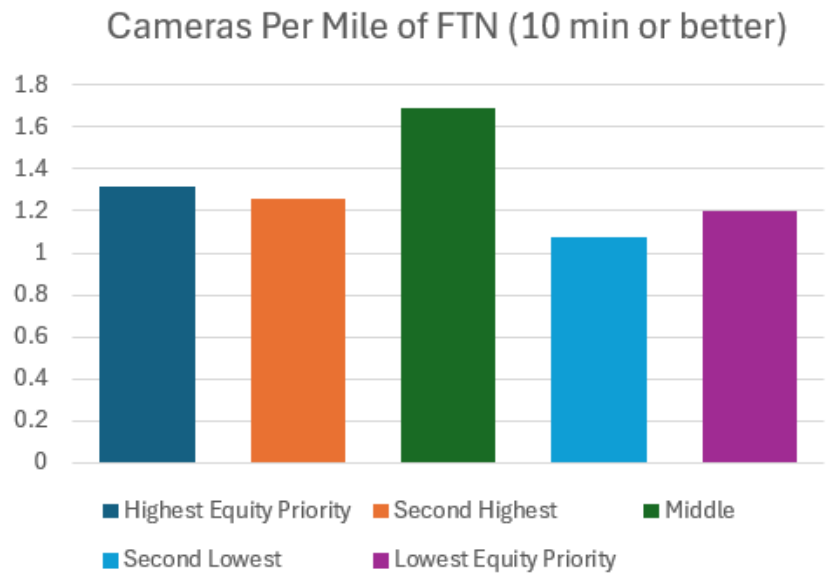


Fig. 3



**The accuracy of the methodology for analyzing the geographic distribution of arterial and frequent transit network segments and cameras on or near geographic borders, such as those of the Racial and Social Equity Index tracts, has been improved since the 2025 report. This does not significantly change the relative distribution of these assets across equity quintiles, but the magnitude of the cameras-to-miles ratios for the frequent transit network has somewhat decreased.*

*Fig. 4**

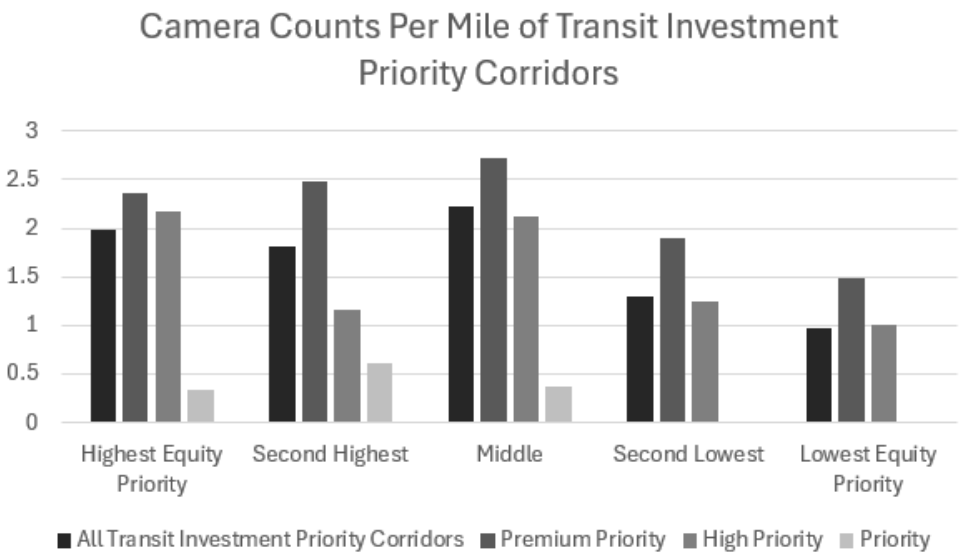
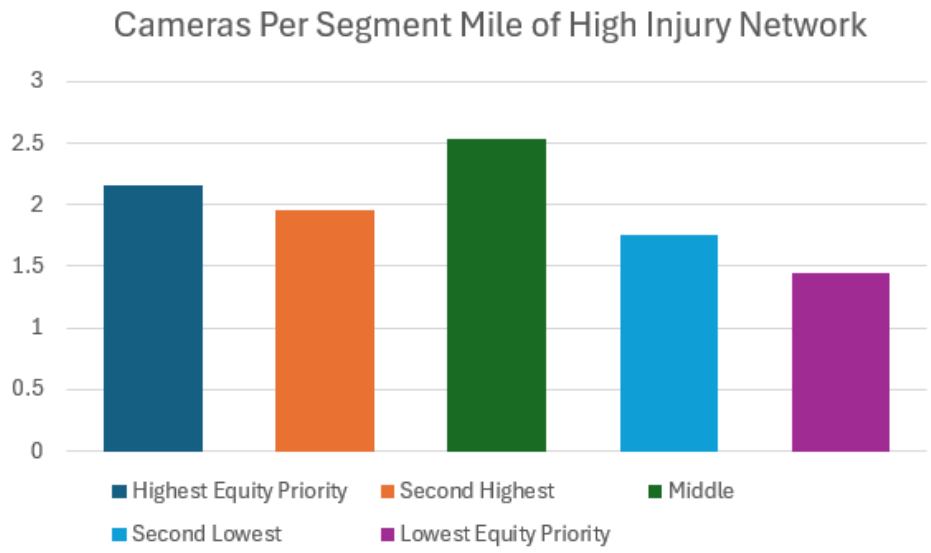


*Fig. 5**



**The magnitudes of the reported cameras-per-segment-mile ratios in figures 4 and 5 are notably greater than they were in 2025. In 2025 the ratios were erroneously calculated and reported on as cameras per segment not cameras per segment mile. This error has been corrected in the 2026 report.*

The distribution in *Figure 2* indicates that our historical investments have resulted in a higher degree of camera coverage and observational capacity on high-volume streets in higher-priority equity areas. This aligns with SDOT's traditional prioritization schema.

The distribution in *Figure 3* indicates a generally even distribution of cameras on the frequent transit network across equity priority quintiles, with a somewhat higher ratio in middle-quintile areas.

The distribution in *Figure 4* indicates that while we are generally seeing a higher rate of camera coverage on our transit investment priority corridors at all levels of investment priority in our higher-equity priority areas, examining opportunities to increase coverage on standard-level priority corridors in all equity quintiles may be worth further investigation. This is true especially for standard-priority segments that directly connect to premium- and high-level investment corridors within higher-equity priority areas.

The distribution in *Figure 5* reflects an opportunity to further refine and target future investments in CCTV coverage. For example, we historically see a higher concentration of fatal and serious injuries in the two highest priority equity quintiles, however we note only a slightly higher camera ratio in these areas compared to the lowest two equity priority areas. By looking at the highest scored corridors on our high injury network, alongside incident-level data and the locations of existing cameras, there may be opportunities to deploy additional cameras in locations that will improve the equity of our ability to monitor areas experiencing the highest levels of high-severity collisions.

Seattle Police Department:

Automated License Plate Readers (ALPR) (Patrol)

As of March 20, 2026, all use of Automatic License Plate Reader (ALPR) technology at SPD has been paused until further notice to operationalize changes required by state legislation recently passed and signed into law. Engrossed Substitute Senate Bill (ESSB) 6002 requires all municipalities in Washington State to utilize ALPR within a new statutory framework, including, but not limited to, specific location prohibitions, retention and audit requirements, and civil and criminal penalties. Accordingly, SPD has stopped collecting ALPR data for all patrol cars and has directed Parking Enforcement Officers to halt all ALPR data collection systems. SPD will pause installing new ALPR readers in vehicles until further notice. Individual employees should not be collecting, using, or accessing ALPR data until further notice.

Prior to the pause described above, a Surveillance Impact Report material update was approved by Council in June of 2024 that expanded ALPR to 360 vehicles. The expansion was completed on October 15, 2024. Fleet-wide ALPR technology leverages high definition in vehicle video cameras to read and analyze license plates along with vehicle make and model in all Seattle Police Department (SPD) vehicles. SPD uses ALPR to check a vehicle against a “HotList” of license plate numbers from the Washington Crime Information Center, the FBI’s National Crime Information Center, and SPD’s investigations to identify stolen vehicles, and vehicles wanted in conjunction with felonies or associated with wanted persons or Amber and Silver Alerts (abducted children and missing people).

Officers must verify that the system accurately read the license plate and ask dispatch to verify that a vehicle is connected with one of the above before taking any action. Deployment of these limited

resources could lead to disproportionality based on census demographics for each precinct, but the distribution is spread evenly across all precincts.

Callyo

Motorola Solutions' Callyo, a software as a service (SaaS), is a cell phone identification masking and recording technology. The technology masks the phone number assigned to an existing phone, displaying a different local number to recipients of calls from the phone. Additionally, the technology can record all calls made to/from the masked phone, covertly record audio, as well as GPS locate the phone of a caller. When Seattle Police Department (SPD) utilizes Callyo to record conversations, the technology is used only with search warrant. Callyo is a subset of the SPD audio recording systems explained in the SIR titled "Audio Recording Systems 'Wires'." Callyo has the ability to disguise the identity of a willing participant by masking a phone number, record phone conversations, covert recording device, and GPS locate identifiable individuals, who are unaware of the operation. Without appropriate safeguards, this raises significant privacy concerns. Recognizing this potential, SPD utilizes Callyo in a limited fashion, and only subject to court order. Callyo can be deployed via signed warrant or RCW 9.73.210/9.73.230.

Callyo deployments are reviewed and tracked by the Criminal Intelligence Unit, but specific metrics of suspect(s) and other parameters are not tracked or documented at this time.

Parking Enforcement Systems (including ALPR)

As of March 20, 2026, all use of Automatic License Plate Reader (ALPR) technology at SPD has been paused until further notice to operationalize changes required by state legislation recently passed and signed into law. Engrossed Substitute Senate Bill (ESSB) 6002 requires all municipalities in Washington State to utilize ALPR within a new statutory framework, including, but not limited to, specific location prohibitions, retention and audit requirements, and civil and criminal penalties. Accordingly, SPD has stopped collecting ALPR data for all patrol cars and has directed Parking Enforcement Officers to halt all ALPR data collection systems. SPD will pause installing new ALPR readers in vehicles until further notice. Individual employees should not be collecting, using, or accessing ALPR data until further notice.

Parking enforcement ALPR is content-neutral. It does not identify the race of the driver or the registered owner of the vehicle. However, SPD must continue to follow its policy of limiting use of the technology to strictly routine parking enforcement as well as continuing to delete all data collected by the parking enforcement ALPR vehicles at the end of a parking enforcement officer's shift. SPD must also continue to ensure that all ALPR data collected by the ALPR scofflaw vehicles is used for legitimate law-enforcement purposes.

The SPD provided technical consultation to the OIG regarding equitable use of ALPR for parking enforcement. The department provided ad hoc feasibility and level of effort estimates for an evidence-based patrol and enforcement saturation management plan. OIG has not presented recommendations requiring this approach yet but the SPD is prepared to respond in the event they do.

Forward Looking Infrared Real-time video (FLIR)

The Forward Looking Infrared Systems (FLIR) camera technology is housed within King County Sheriff's Office (KCSO) helicopters and provides an enhanced video of incident scenes by layering heat signature capabilities with aerial video. The FLIR technology allows for subjects to be detected even when obscured by clouds, haze, and/or darkness.

In their 2022 review, the Office of the Inspector General (OIG) evaluated addresses where KCSO helicopter disproportionately responded to communities already considered at the greatest disadvantage. However, because Guardian One typically responds to incidents already in progress, OIG could not draw conclusions about disparity in use of the helicopter without a broader review of police deployment and responses.

Situational Awareness Cameras

The SPD Special Weapons and Tactics (SWAT) Unit uses two types of Situational Awareness Cameras: Robot Mounted Cameras and Pole Cameras.

SWAT's written log mentions operations were conducted pursuant to a warrant. All other instances where a warrant was not specified in the SWAT narrative appeared to be exigent circumstances and did not appear to unreasonably infringe upon individuals' civil liberties. Suspects and subjects in incidents where Situational Awareness Cameras are deployed are unlikely to be affected by the technology itself. When this technology is deployed in compliance within SPD policy and as described in the SIR, it is more likely to reduce the likelihood of violence by better informing SWAT personnel decision-making.

At this time SPD is unable to provide any metrics for analysis, as the SWAT Unit does not currently collect the requested material on individual deployment basis. This should be improved in the future.

Audio Recording Systems

Audio recording systems are used exclusively during the investigation of crimes and only with consent and/or court- ordered warrant, having established probable cause. There is no distinction in the levels of service SPD provides to the various and diverse neighborhoods, communities, or individuals within the city.

At this time SPD is unable to provide any metrics for analysis, as the Intelligence Unit does not currently collect the requested material on individual deployment basis. This should be improved in the future.

Camera Systems – Images or Non-Auditory Video Recordings

At this time SPD is unable to provide any metrics for analysis, as the department does not currently collect the requested material on an individual deployment basis.

Tracking Devices

Tracking devices are used exclusively during the investigation of crimes and only with consent and/or court-ordered warrant, having established probable cause. There is no distinction in the levels of service SPD provides to the various and diverse neighborhoods, communities, or individuals within the city.

At this time SPD is unable to provide any metrics for analysis, as the Intelligence Unit does not currently collect the requested material on an individual deployment basis. This should be improved in the future.

Remotely Operated Vehicles

The decision to use Remotely Operated Vehicles (ROVs) is made on a case-by-case basis. SPD does not deploy these devices proactively, but rather as a result of a call for service or pre-planned operation in response to a specific action. Absent exigent circumstances, or consent, a signed warrant is obtained prior to the use of this technology in any protected area.

At this time SPD is unable to provide any metrics for analysis, as the department does not currently collect the requested material on an individual deployment basis. This should be improved in the future.

Computer/Cellphone and Mobile Device Extraction Tools

Data extraction tools are used exclusively during the investigation of crimes and only with consent and/or court- ordered warrant, having established probable cause. There is no distinction in the levels of service SPD provides to the various and diverse neighborhoods, communities, or individuals within the city.

At this time SPD is unable to provide any metrics for analysis, as the Intelligence Unit does not currently collect the requested material on an individual deployment basis. This should be improved in the future.

Hostage Negotiation Throw Phones

The hostage negotiation throw phone is a phone in a hardened case that is part of a communications system for use in police hostage/crisis negotiations with subjects. The phone case includes microphones and speakers to enable two-way communication in an overt or covert manner. It includes hidden cameras to support threat and tactical assessments. Hostage Negotiation Throw Phones are used during a hostage, crisis, or barricaded person situation. There is no distinction in the levels of service SPD provides to the various and diverse neighborhoods, communities, or individuals within the city.

At this time SPD is unable to provide any metrics for analysis, as the Intelligence Unit does not currently collect the requested material on an individual deployment basis.

Real-Time Crime Center

Real-Time Crime Center (RTCC) software provides a centralized location for real-time information and analysis. At its core, RTCC software integrates dispatch, cameras, officer location, 911 calls, records management system, and other information into one single view. The software is used to alert real-time

crime center staff to a serious criminal event, see multiple streams of information overlaid on a map view, and convey that information to officers who are responding in the field.

SPD operates under a plan designed to actively manage performance measures reflecting the "total cost of ownership of public safety," Equity, Accountability, and Quality ("EAQ"), which includes measures of disparate impact and over-policing. In addition to a robust Continuous Intervention Assessment designed to inform, in real-time, the active development of a safer, more effective, Evidence-Based Policing (EBP) competency, the EAQ program assures just right policing is achieved with undue collateral harm. SPD has embraced a continuous improvement ethos. Rather than comprehensive reports on an extended cadence, the EAQ program is designed for continuous management, engagement, and improvement of the metrics in question. No single report results from this process.

Data from RTCC is now being captured through the use of a "RTCC Report" configured in the SPD Records Management System. The data serve a forensic purpose, documenting what was done to support the response, as well as evaluation. The SPD is actively supporting the OIG and their evaluation contractor, the University of Pennsylvania. A preliminary evaluation of RTCC and the technologies they employ will be conducted to confirm data collection systems are operating as designed and identify any gaps before the end of 2026. In addition to this, SPD is also actively supporting the NYU Policing Project in an audit of this system. Lastly, the SPD continues to monitor "Equity" and "Accountability" (over-policing) in the areas where RTCC response support is most common.

Closed-Circuit Television (CCTV) Camera Systems

The purpose of the CCTV program is to deter and detect criminal activity, help collect evidence related to serious and/or violent criminal activity, and hold offenders accountable. The CCTV camera systems are installed at specific locations where gun violence, human trafficking, and persistent felony crime is concentrated. The cameras face toward the street, sidewalk, and other public areas and signs are posted identifying their presence. Privately-owned security systems can also share video streams of public areas with SPD.

SPD has a plan to actively manage performance measures reflecting the "total cost of ownership of public safety," Equity, Accountability, and Quality ("EAQ"), which includes measures of disparate impact and over-policing. In addition to a robust Continuous Intervention Assessment designed to inform, in real-time, the active development of a safer, more effective, Evidence-Based Policing (EBP) competency, the EAQ program assures just right policing is achieved with undue collateral harm. SPD has embraced a continuous improvement ethos. Rather than comprehensive reports on an extended cadence, the EAQ program is designed for continuous management, engagement, and improvement of the metrics in question. No single report results from this process.

As indicated in the RTCC section above, the same equity and accountability measures used to monitor RTCC will apply for CCTV. The department will be closely monitoring the differential frisk rate to determine whether better information available to responders affects the differential perception of dangerousness responsible for the disparate frisk rate. Similarly, with better information supporting

responders, the department will be monitoring patrol patterns to determine if more objective operational intelligence affects discretionary patrol activity as reflected in measures of over-policing.