



**Seattle** Office of  
Inspector General

# Consolidated Risk Surveillance Usage Review 2023

*As Required by Seattle Municipal Code 14.18.060*

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## Table of Contents

Purpose .....	2
Consolidated Surveillance Review Methodology .....	3
Automatic License Plate Readers – Parking Enforcement .....	4
Audio Recording Systems .....	5
Situational Awareness Cameras Without Recording .....	6
911 Logging Recorder .....	7
Link Analysis Software – IBM i2 iBase .....	8
Video Recording Systems .....	9

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## Purpose

Seattle Municipal Code 14.18 governs the process through which City departments acquire surveillance technologies. Chapter 14.18.060 requires OIG to conduct annual reviews of the Seattle Police Department's (SPD) use of surveillance technologies, focusing on six areas:

- a. Technology Use – frequency and usage patterns
- b. Data Sharing – the frequency and patterns of data sharing
- c. Data Security – how well SPD safeguards individual information
- d. Potential Civil Liberties Impacts – real or possible impacts to civil liberties and any disproportionate impacts on disadvantaged populations
- e. Internal Assessments – any internal audits, new concerns registered by community members, or complaints made to the Office of Police Accountability (OPA) about the surveillance technology
- f. Annual Costs

At the start of 2023, SPD had 16 technologies the City considered to be surveillance. In order to balance the workload with current resources, OIG designated two levels of reporting based on a given technology's risk:

- **Individual Surveillance Reviews:** New technologies or those with higher risk are evaluated through compliance reviews, which establish tests for compliance with internal policies, local/state laws, or a technology's Surveillance Impact Report (SIR), which is published by SPD.
- **Consolidated Surveillance Review:** Technologies that OIG has previously reviewed and carry lower risk are assessed through a survey and combined in a single report.

## Methodology

### Consolidated Surveillance Review Methodology

This report is a consolidated surveillance review comprising the following six technologies:

1. Automatic License Plate Readers (ALPR) – Parking Enforcement (PE)
2. Audio Recording Devices
3. Situational Awareness Cameras Without Recording
4. 911 Logging Recorder\*
5. Link Analysis Software – IBM i2 iBase\*
6. Video Recording Systems\*

Three surveillance technologies on this list are marked with asterisks. In September 2024, they were re-classified and no longer implicate SMC 14.18. As a result, this will be the final review for those three technologies. Outstanding recommendations from prior Annual Usage Reviews of re-classified technologies will be closed. The other three technologies will continue to be evaluated annually.

To inform this consolidated review, OIG formed a standard assessment consisting of 27 questions pertaining to technical capabilities, policies and procedures, and current use of each technology. Some questions were submitted to subject matter experts at SPD who provided the most up-to-date information on usage. Statements provided by SPD for technologies in the consolidated review were not verified by OIG but were consistent with OIG's understanding of the technologies and prior findings.

## Automatic License Plate Readers – Parking Enforcement

The Automated License Plate Reader (ALPR) surveillance technology is a high definition, infrared digital camera system installed in eight Parking Enforcement vehicles.<sup>1</sup> Parking Enforcement – a division of SPD – uses their ALPR systems to identify parking and scofflaw violations. Parking Enforcement management reported no significant changes to their use of ALPRs. The following is a summary of some considerations in assessing this technology:

### Technology Use

Technology is directed at vehicles along public roadways and most license plate images are retained for three minutes.

### Data Sharing

PE management have received few, if any, sharing requests in prior years and the retention periods shorten the number of available records.

### Data Security

Most license plate reads are retained for only three minutes, except for possible scofflaw violations or possible stolen vehicles, which are retained for 90 days. Few personnel have access to either the ALPR-equipped vehicles or to the data generated by them.

### Potential Civil Liberties Impacts

License plate scans are retained for only three minutes, unless they match a criminal record or scofflaw violation, in which cases they are retained for 90 days.

PE officers have some discretion in choosing patrol routes, which could result in certain locations being subject to higher rates of surveillance.

### Internal Assessments

No new assessments, registered community concerns, or OPA complaints.

### Costs

No significant changes from the 2022 annual costs, \$28,300.

<sup>1</sup> The inaugural review of this surveillance technology can be accessed here: [SurveillanceTechnologyUsageReview-ParkingEnforcementALPRSystems\(2021and2022\).pdf](#)

## Audio Recording Systems

Audio Recording Systems are covert physical devices used to obtain information in criminal investigations.<sup>2</sup> The Technical & Electronic Support Unit manages these devices and oversees requests to use them. Requests to use this surveillance technology must adhere to the Washington Privacy Act, Chapter 9.73, which requires two-party consent. Two-party consent to record can be satisfied with a warrant approving the collection of audio. Once approved, an Audio Recording System may be deployed on a person, concealed in a space, or disguised within/on objects to capture audio of conversations between identifiable individuals. In almost all cases, at least one participant – the suspect – is unaware of the recording. TESU personnel reported no significant changes to their use of Audio Recording Systems. The following is a summary of some considerations in assessing this technology:

### Technology Use

This technology is used sparingly: in 2023 there were fewer than ten deployments.

### Data Sharing

Data collected are sensitive and case officers become the data custodians of audio recordings after deployment. Individually, case officers manage data sharing and, thus, tracking all instances of data sharing has not been feasible.

### Data Security

Data collected are stored on external disks/discs. Case officers are responsible for submitting stored recordings to the Evidence Unit.

### Potential Civil Liberties Impacts

Requests to use this surveillance technology must adhere to the Washington Privacy Act, Chapter 9.73, which requires two-party consent. Two-party consent to record can be satisfied with a warrant approving the collection of audio.

### Internal Assessments

No new assessments, registered community concerns, or OPA complaints.

### Costs

No significant changes from the 2022 annual costs, \$7,342.65.

<sup>2</sup> The inaugural review of this surveillance technology can be accessed here: [Surveillance Technology Usage Review – Audio Recording Systems \(2022\).pdf](#)

## Situational Awareness Cameras Without Recording

TESU Special Weapons and Tactics (SWAT) temporarily deploys these Situational Awareness Cameras Without Recording to view surroundings and gain additional information prior to entering a location.<sup>1</sup> This deployment method provides additional safety and security to SPD personnel, the subjects of the observation, and other members of the community. SWAT owns several different types of cameras, which are specialized for different uses. SWAT personnel deploy these cameras in dangerous situations, such as warrant service or armed and barricaded subjects. SWAT personnel reported no significant changes to their use of Situational Awareness Cameras Without Recording. The following is a summary of some considerations in assessing this technology:

### Technology Use

Situational Awareness Cameras are used sparingly and in dangerous situations: in 2023 these cameras were deployed for approximately 20 incidents.

### Data Sharing

Situational Awareness Cameras do not record, and, thus, there are no data available to be shared.

### Data Security

Situational Awareness Cameras do not record, and, thus, there are no data to be safeguarded or stored.

### Potential Civil Liberties Impacts

Situational Awareness Cameras are used to provide additional safety in dangerous situations, and - when used according to the SIR - these cameras are not expected to impact civil liberties or have disproportionate impacts.

### Internal Assessments

No new assessments, registered community concerns, or OPA complaints.

### Costs

No significant changes from the 2022 annual costs, approximately \$200.

<sup>3</sup> The inaugural review of this surveillance technology can be accessed here: [Surveillance Technology Usage Review\\_Situational Awareness Cameras Without Recording \(2021 and 2022\).pdf](#)

## 911 Logging Recorder

The NICE Systems 911 Logging Recorder is an application that automatically records 911 and non-emergency telephone calls and police radio traffic for evidentiary and public disclosure purposes.<sup>4</sup> Personnel from the Community Assisted Response & Engagement Department (CARE) use the NICE System every day to manage emergency and non-emergency requests for service, to dispatch emergency services, and communicate with other agencies (such as Washington State Patrol or King County Sheriff's Office). CARE personnel report that their office receives several hundred thousand requests for service annually, and they report no significant changes to their use of this technology. As of September 2024, this technology no longer implicates SMC 14.18. The following is a summary of some considerations in assessing this technology:

### Technology Use

This technology is used every day, logging all calls (emergency, non-emergency, and dispatch).

### Data Sharing

This technology generates many records. In prior years, CARE personnel shared between four and five thousand calls relevant to investigations.

### Data Security

Calls are stored for 90 days before being purged. Any calls related to ongoing investigations are stored in a secure server with limited access.

### Potential Civil Liberties Impacts

The technology itself is not likely to impact civil liberties or have disproportionate impacts on disadvantaged populations.

### Internal Assessments

No new assessments, registered community concerns, or OPA complaints.

### Costs

No significant changes from the 2022 annual costs, approximately \$50,000.

<sup>4</sup> The inaugural review of this surveillance technology can be accessed here: [Surveillance Technology Usage Review - 9-1-1 Logging Recorder.pdf](#)

## Link Analysis Software — IBM i2 iBase

i2 iBase is the back-end server software for the i2 Analyst's Notebook application, a software system that organizes existing SPD data into visually accessible information.<sup>1</sup> When paired with the i2 Analyst's Notebook, this link analysis software works as a relational database application and a visual analysis tool used by analysts within the Real-Time Crime Center (RTCC). The purpose of this technology is to capture, analyze, and display existing SPD data to assist analysts with better understanding criminal conspiracy networks, the chronology of events in a case, and the associations between victims, suspects, and locations. Generally, RTCC personnel use the technology at the request of SPD management for crime trend analyses or from detectives or case officers who wish to present complex evidence visually. RTCC personnel reported no significant changes to their use of this technology. As of September 2024, this technology no longer implicates SMC 14.18. The following is a summary of some considerations in assessing this technology:

### Technology Use

RTCC personnel use this technology infrequently and is generally used for crime trend analyses and to visualize complex criminal conspiracies and cases.

### Data Sharing

The technology itself does not collect or create surveillance data; rather, it visualizes investigation information. Visualizations may be shared with courts when the investigation is complete and moves into prosecution.

### Data Security

The technology itself does not collect or create surveillance data; those data are secured in CJIS-compliant databases. Visualizations are stored in a local server operated by RTCC personnel.

### Potential Civil Liberties Impacts

The technology itself is not likely to impact civil liberties or have disproportionate impacts on disadvantaged populations.

### Internal Assessments

No new assessments, registered community concerns, or OPA complaints.

### Costs

No significant changes from the 2022 annual costs, approximately \$25,000.

<sup>5</sup> The inaugural review of this technology can be accessed here:  
[Surveillance Technology Usage Review i2 iBase Link Analysis Software \(2022\)](#)



## Video Recording Systems

SPD uses Video Recording Systems in specific, secure locations inside of SPD facilities. Multiple different systems are used based on the facility setting: holding cells, interview rooms, and the blood-alcohol content (BAC) collection areas.<sup>6</sup> Each system is composed of a network of cameras that transmit video to either an on premises digital video recorder (DVR) device or to cloud storage. These systems store the most recent 60 days of recordings. Older data are automatically wiped from the device unless a detective selects and downloads recordings for permanent storage as evidence. SPD reported no significant changes to their use of this technology. As of September 2024, this technology no longer implicates SMC 14.18. The following is a summary of some considerations in assessing this technology:

### Technology Use

Video Recording Systems are used every day. They monitor BAC collection areas, interview rooms, and holding cells.

### Data Sharing

Sharing of audio/video recording occurs rarely. Whenever sharing does occur, it happens in the context of prosecutions.

### Data Security

There are multiple Video Recording Systems; all stream to a secure server. Any recordings relevant to an investigation are stored in either the digital evidence management system or on a physical disk given to the Evidence Unit.

### Potential Civil Liberties Impacts

Pursuant to RCW 9.73, cameras for all Video Recording Systems are conspicuous and signs near the camera provide notice of audio/video recording. Whenever officers enter the room or area, they also verbally notify subjects of the ongoing audio/video recording.

### Internal Assessments

No new assessments, registered community concerns, or OPA complaints.

### Costs

No significant changes from the 2022 annual costs approximately \$57,000.

<sup>6</sup> The inaugural review of this technology can be accessed here: [Surveillance Technology Usage Review\\_Video Recording Systems \(2021 and 2022\).pdf](#)