

From: Seattle Community Surveillance Working Group (CSWG)  
To: Seattle City Council  
Date: Dec 15, 2020  
Re: Privacy and Civil Liberties Impact Assessment for Video Recording Systems

## Executive Summary

The CSWG has completed its review of the Surveillance Impact Reports (SIRs) for the three surveillance technologies included in Group 3 of the Seattle Surveillance Ordinance technology review process. These technologies are Forward Looking Infrared, Video Recording Systems, and Situational Awareness Cameras Without Recording. This document is the CSWG's Privacy and Civil Liberties Impact Assessment for Situational Awareness Cameras Without Recording as set forth in SMC 14.18.080(B)(1), which we provide for inclusion in the final SIRs submitted to the City Councils.

This document first provides our recommendations to Council, then provides background information, key concerns, and outstanding questions regarding Situational Awareness Cameras Without Recording.

Our assessment of Situational Awareness Cameras as used by Seattle Police Department (SPD) focuses on three major issues:

1. Additional policy language is necessary to define valid purposes of use.
2. The capabilities of the situational awareness cameras are unclear.
3. It is unclear what technical and procedural safeguards are in place to prevent the improper viewing, collection, and storage of images.

## Recommendations:

We recommend that the Council adopt, via ordinance, at a minimum, clear and enforceable rules that ensure the following:

1. **SPD must abide by a specific and restricted purpose of use:** The ordinance should define a specific purpose of use for situational awareness cameras used by SPD, and any use must be restricted to that specific purpose.
2. **SPD must not use any situational awareness cameras that have capabilities beyond what is strictly necessary to fulfill the purpose of use defined by the ordinance.** The ordinance should prohibit SPD from using cameras that have facial recognition or recording capabilities.
3. **SPD must adopt technical and procedural safeguards to prevent misuse of the situational awareness cameras.** The ordinance should require SPD adopt safeguards that prevent use of the cameras or the footage streamed from the cameras for purposes beyond what is defined in the ordinance.

## Outstanding Questions

1. What are the complete model names/numbers for each of the equipment in scope for the Situational Awareness Cameras?
2. What technical safeguards are in place to prevent the storage/retention of images?
3. 7.3 of Situational Awareness Cameras SIR states "[the SWAT Unit] have mitigated the risk of improper viewing of the protected areas." How specifically have they mitigated the risk?
4. What (if any) sections of the SPD Manual specifically cover the use of these technologies by SWAT?