

From: Seattle Community Surveillance Working Group (CSWG)  
To: Seattle City Council  
Date: June 4, 2019  
Re: Privacy and Civil Liberties Impact Assessment for Computer-Aided Dispatch (Seattle Fire Department)

## **Executive Summary**

On April 25, 2019, the CSWG received the Surveillance Impact Report (SIR) on Computer-Aided Dispatch (CAD), a surveillance technology used by the Seattle Fire Department (SFD) included in Group 2 of the Seattle Surveillance Ordinance technology review process. This document is CSWG's Privacy and Civil Liberties Impact Assessment for this technology as set forth in SMC 14.18.080(B)(1), which we provide for inclusion in the final SIR submitted to the City Council.

This document first provides background information on CAD technology (SFD) (TriTech), and then lists key concerns, outstanding questions, and recommendations on the technology.

Our assessment of CAD (SFD) focuses on three major issues rendering protections around this technology inadequate:

- (1) No limits on data retention.
- (2) Lack of clarity on what data is accessible to the vendor.
- (3) Lack of clarity on data sharing partners.
- (4) Lack of clarity on whether original contracts and privacy policies have remained unchanged as a result of the CentralSquare merger (TriTech joined a merger with 3 other companies in 2018).

## **Background on Computer-Aided Dispatch (CAD) (TriTech)– Seattle Fire Department (SFD)**

Computer Aided Dispatch (CAD) is a suite of software packages, provided by TriTech, and used by SFD to provide unit recommendations for 9-1-1 emergency calls based on the reported problem and location of a caller. CAD allows SFD to manage emergency and non-emergency call taking and dispatching operations. The technology allows SFD to quickly enable personnel to execute rapid aid deployment.

In September 2018, TriTech joined a merger with Superion, Zuercher, and Aptean, leading to the creation of a new entity called CentralSquare.<sup>1</sup> Though TriTech is still the underlying technology supplying SFD with CAD services, CentralSquare is now the dispatch service provider.

To its credit, SFD clearly defines the purpose of use and specifies policies on operation and training. However, SFD should justify its data retention policies, clarify what data is retained within CAD, provide information about its data sharing partners, and clarify if the original contracts and privacy policies with TriTech have remained unchanged as a result of the CentralSquare merger.

## **Key Concerns**

- (1) **No limits on data retention.** Section 5.4 of the SIR states: “Data is retained for the life of the system.” It is not clear how indefinite retention of this data is justified by the purpose of the technology, which is management of emergency calls. Additionally, this data likely includes personally identifiable information (e.g., names, addresses, and phone numbers), but exactly what data is being retained is not clearly specified.

---

<sup>1</sup> <https://www.centalsquare.com/article/superion-tritech-zuercher-and-aptians-public-sector-business-merge-form-centralsquare>

- (2) **Lack of clarity on what data is accessible to the vendor (TriTech/CentralSquare).** It is unclear if the CAD system stores data, and what data is accessible to the vendor (e.g., call logs).
- (3) **No clear limits on and terms of third party data sharing.** In Section 6.3 of the SIR, SFD states that in rare cases where CAD data is shared with partners other than those specifically named in the SIR (e.g., University of Washington’s Harborview Medical Center, American Medical Response, and King County), a third-party nondisclosure agreement is signed. However, there are no examples or details of who these other partners are and the purposes for which CAD data would be shared. Furthermore, the diagram on page 306, “Seattle Fire Department: Computer Aided Dispatch Environment”<sup>2</sup> depicts an SFD-owned reporting server that has a database replication of the TriTech server CAD data. That reporting server then connects to “SFDINTSPD” which in turn connects to “SPD CAD (Versaterm) & COPS Application”. The network lines on this diagram indicate that Seattle Police Department’s (SPD) access to SFD CAD data is continuous and not on an as-needed basis, and is reviewed by SFD before being supplied to SPD. Whether or not SPD has continuous/full access to SFD CAD data, and for what purpose, needs to be clarified.
- (4) **Lack of clarity on whether original contracts and privacy policies have remained unchanged as a result of the CentralSquare merger.** Due diligence should be exercised to ensure that CentralSquare is keeping up to date with industry best practices for security and data protection, and that the original contracts and privacy policies as described in the SIR have remained unchanged as a result of the merger.

## Outstanding Questions

- Does the CAD system itself store data? If so, what data and for how long? Who can access that data?
- What is the exhaustive list of SFD’s data sharing partners? For what purpose is data shared with them? Is there a contract or NDA with each one?
- Does SPD have continuous/full access to SFD CAD data or is that data provided on an as-needed basis after review by SFD? If not, what limits the scope of data sharing with SPD?
- Have the original contracts and privacy policies as described in the SIR remained unchanged as a result of the CentralSquare merger?

## Recommendations

Depending on the answers to the questions above, additional recommendations may be added.

The Council should ensure that SFD adopt clear and enforceable policies that ensure, at a minimum, the following:

- (1) The purpose of use of CAD (SFD) must be clearly defined as emergency operations, and its operation and data collected must be explicitly restricted to that purpose only.
- (2) Data retention must be limited to the time needed to effectuate the purpose defined (i.e., CAD data that is no longer needed must be promptly deleted)—in other words, the current indefinite retention policy should be justified or ended.
- (3) Data sharing with third parties, if any, must be limited to those held to the same restrictions as SFD, and all partnerships and data flows between SFD and third parties must be explicitly disclosed and

---

<sup>2</sup> See Appendix 1: Seattle Fire Department: Computer Aided Dispatch Environment

protected by written agreements.

- (4) Clear policies must govern operation of CAD, and all operators should be trained in those policies.

