

City of Seattle

Master List of Surveillance Technologies

Revised September 2024

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Executive Summary

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 on September 1, 2017, outlines requirements that include: surveillance technology review and approval by City Council before acquisition, Council review and approval via ordinance for existing technologies, and reporting about surveillance technology use and community impact.

The original master list was submitted to Council and the City Clerk on November 30, 2017. Surveillance Ordinance section three required the City’s Chief Technology Officer to compile a Master List of surveillance technologies in use by City departments as of the date the Surveillance Ordinance took effect (“Master List”), and to submit this report within 90 days of the Surveillance Ordinance’s effective date. Department privacy champions worked with the Seattle IT Privacy Team to identify surveillance technologies in use. The list in this report represents the best effort of departments to identify existing technologies based on the definition and criteria outlined in the Surveillance Ordinance. Should additional technologies that were in use as of September 1, 2017 be discovered, this report will be amended and resubmitted.

As of September 2024, the following departments currently use surveillance technology. These departments 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	11
Total	12

About The Master List

This report was mandated as part the Surveillance Ordinance approved by City Council in August 2017. It was compiled with active input of all City departments. The Master List was compiled through the process detailed in Appendix A, using the criteria detailed in Appendix B.

March 2021 Re-Submission

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 is being re-submitted to Council, City Clerk, and the Mayor’s Office to:

1. Revise the order and cadence at which the retroactive Surveillance Impact Reports (SIRs) will be submitted.
2. Accommodate the timeline and submission cadence of the Surveillance Advisory Working Group and associated public engagement efforts.

August 2021 Re-Submission

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 is being re-submitted to Council, City Clerk, and the Mayor’s Office to:

1. Update table for Group 4A and Group 4B. The March 2021 revised Master List grouped three technologies under one (Undercover/ Technologies). They are now represented individually as three separate technologies (Audio Recording Systems, Camera Systems, and Tracking Devices) for an updated total of 28 total technologies. After the ungrouping, Audio Recording Systems was moved to Group 4A and GeoTime was moved to Group 4B. The table for Group 4A and Group 4B has been revised to reflect these updates.
2. Accommodate the timeline and submission cadence of the Surveillance Advisory Working Group and associated public engagement efforts.

September 2024 Re-Submission

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 is being re-submitted to Council, City Clerk, and the Mayor’s Office to:

Update the Master List to remove deprecated technologies no longer in use by City Departments, as well as technologies that do not meet the updated criteria outlined in revised City Policy POL-203, and the Ordinance definition of Surveillance Technology as follows: Surveillance Technology means any electronic device, software program, or hosted software solution; that is designed or primarily intended to be used for the purpose of surveillance.

Because of the initial short timeline to compile the first master list in 2017, staff were unable to conduct a detailed privacy and policy review for many of these technologies. As staff were able to further

examine these technologies and learn more their use, Seattle IT and its departmental partners identified entries on the Master List that:

- 1) Do not meet the definition of surveillance, or
- 2) Meets one or more of the exemptions and exceptions criteria as outlined in [SMC 14.18.030](#), or
- 3) Are not in use by the designated City department, either through department direction or alternative acquisition, or
- 4) Are being reclassified into a category of similar technologies.

After a thorough review and evaluation, the technologies listed in the following table are being removed as they are either deprecated, do not pose a serious risk to civil liberties or freedom of association, or are not primarily intended to surveil. Furthermore, previous input was provided by the Community Surveillance Working Group regarding the removal of several technologies that are of low concern to civil liberties advocates.

Technologies Identified for Reclassification

Department	Technology	SIR Council Bill	Reason for Reclassification
SCL	Binoculars/Spotting Scope	CB 120002 (passed by Council on 3/22/21)	This technology does not meet the surveillance definition.
SCL	Check Meter Device	CB 120002 (passed by Council on 3/22/21)	This technology does not meet the surveillance definition.
SCL	SensorLink Amp Fork	CB 120002 (passed by Council on 3/22/21)	This technology does not meet the surveillance definition.
SDOT	Acyclica	No CB because the technology was deprecated during SIR process.	This technology was deprecated.
SDOT	License Plate Readers	CB 119519 (passed by Council on 9/23/19)	This technology has been deprecated.
SFD	Computer-Aided Dispatch	CB 120003 (passed by Council on 3/22/21)	This technology does not meet the surveillance definition as it is primarily intended to assist in first responder dispatch in emergency situations.
SFD	Emergency Scene Cameras	CB 120171 (passed by Council on 9/20/21)	This technology does not meet the surveillance definition as the primary intent is to document aspects of emergency response and investigations.

SFD	Hazmat Camera	CB 120171 (passed by Council on 9/20/21)	This technology does not meet the surveillance definition, as it is not primarily intended to surveil. Capture of individuals on video would be incidental and unused.
SPD	911 Logging Recorder	CB 120024 (passed by Council on 4/19/21)	This technology does not meet the surveillance definition, it is used to document 911 calls for use in investigations and legal discovery. Callers are provided notice of recordings. It does not track or monitor individuals.
SPD	Computer-Aided Dispatch	CB 120027 (passed by Council on 4/19/21)	This technology does not meet the surveillance definition, it is used to gather information about an emergency to determine and dispatch appropriate response resources. It does not track or monitor individuals.
SPD	Video Recording Systems	CB 120055 (passed by Council on 5/24/21)	This technology does not meet the surveillance definition, as notice is provided near all recording cameras which are installed in plain sight.
SPD	IBM i2 iBase	CB 120309 (passed by Council on 5/17/22)	This technology does not meet the definition of surveillance.
SPD	Crash Data Retrieval Tools	CB 120500 (passed by Council on 2/28/23)	This technology does not meet the definition of surveillance.
SPD	Maltego	No CB because the technology was deprecated during SIR process.	This technology was deprecated.
SPD	Coplogic	CB 120028 (passed by Council on 4/19/21)	This technology does not meet the definition of surveillance.
SPD	GeoTime	CB 120502 (passed by Council on 2/28/23)	This technology does not meet the definition of surveillance.

Surveillance Ordinance

[SMC 14.18](#), also referred to as the “Surveillance Ordinance”, took effect on September 1, 2017 and has implications for the acquisition of new technologies by the City, and technologies that are already in use that may fall under the new, broader definition of surveillance.

SMC 14.18.020.B.1 charges the City’s Executive with developing a process to identify surveillance technologies subject to the Ordinance. Seattle IT, on behalf of the Executive, developed and implemented a process through which a privacy and surveillance review is completed prior to the acquisition of new technologies. This requirement, and the criteria used in the review process, are documented in Seattle IT Policy [POL-203](#), “Surveillance Policy”.

Master List Requirements

Surveillance Ordinance SMC 14.18.050.B. Section 3 requires the City’s Chief Technology Officer to compile a Master List of technologies in use as of September 1, 2017 that meets the definition of surveillance technology (“Master List”). Specifically, the Surveillance Ordinance states:

Section 3. Notwithstanding the provisions of Chapter 14.18 of the Seattle Municipal Code, each City department may use surveillance technology that has not received prior Council approval under Chapter 14.18 when the technology is, as of the effective date of this ordinance, (1) in the department’s possession or (2) in the execution or closeout phase of acquisition or has had a purchase order issued, pursuant to the Chief Technology Officer’s authority under subsection 3.23.030.C of the Seattle Municipal Code; provided, that the department complies with the procedures set forth in this section for Council approval. The SIRs on all identified retroactive technologies on the Master Technology List must be submitted to Council by March 1, 2020. The Executive shall by September 1, 2019 submit to the Council a status report on the development of the SIRs for retroactive technologies. The report shall describe the public engagement and workgroup process that is completed or planned for each SIR as well as a timeline for when the department expects to finish work on all SIRs for retroactive technologies.

Each City department shall compile a list of all surveillance technology that it controls and is utilizing as of the effective date of this ordinance that is not covered by an exemption or exception to the requirements of Chapter 14.18 of the Seattle Municipal Code, and submit it to the CTO, or submit an affirmative statement that there are no such technologies. The list shall identify for each technology whether the technology has received prior Council approval under Chapter 14.18, and if so, the ordinance number. The CTO shall compile a master list that contains the information submitted by each department and that identifies separately for each department the order and timeframe in which the technology is recommended to be brought to the Council for ordinance approval. The master list shall be filed within 90 days of the effective date of this ordinance with the City Clerk, with an electronic copy to the Chair of the committee responsible for technology, the Director of Central Staff, the Chief Technology Officer, and the Inspector General for Public Safety. The CTO may make corrections to the master list, which must be timely filed with the City Clerk. Each City department shall submit requests for surveillance technology ordinance approval for technologies on the master list consistent with Chapter 14.18 of the Seattle Municipal in the order and timeframe contained in the master list,

beginning no later than January 31, 2019, and at a rate of at least 12 in a 12-month period. The Council may revise or re-order the master list by resolution.

Note that technologies exempted from Surveillance Ordinance in SMC 14.18.030 are not included in the Master List.

Master List (Updated September 2024)

Technologies in use as of the effective date of this Surveillance Ordinance are listed below, organized into four groups as part of the SIR submission process to the City Council.

Group One Technology Review

Department	Technology	SIR Council Bill	Description
SDOT	Closed Circuit Television Equipment "Traffic Cameras"	CB 119519 (passed by Council on 9/23/19)	SDOT has cameras installed throughout the City to monitor congestion, incidents, closures, and other traffic issues. The technology provides the ability to see roads, providing engineers with the necessary information to manage an incident and identify alternate routes. Every camera is available for live viewing by the public via our Traveler Information Web Map (http://web6.seattle.gov/Travelers/). The video is not archived. This information is collected under the authority of SMC 11.16.200 requiring SDOT to keep records of traffic volumes.

Group Two Technology Review

Department	Technology	SIR Council Bill	Description
SPD	Automated License Plate Recognition (ALPR)	CB 120025 (passed by Council on 4/19/21) CB 120778 (passed by Council on 6/18/24)	ALPRs are computer-controlled, high-speed camera systems mounted on parking enforcement or police vehicles that automatically capture an image of license plates that come into view and converts the image of the license plate into alphanumeric data that can be used to locate vehicles reported stolen or otherwise sought for public safety purposes and to enforce parking restrictions.

SPD	Parking Enforcement Systems	CB 120026 (passed by Council on 4/19/21)	Several applications are linked together to comprise the enforcement system and used with ALPR for issuing parking citations. This is in support of enforcing the Scofflaw Ordinance SMC 11.35.
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Group Three Technology Review

Department	Technology	SIR Council Bill	Description
SPD	Forward Looking Infrared Real-time video (FLIR)	CB 120053 (passed by Council on 5/24/21) CB 120518 (passed by Council on 3/14/23)	Two King County Sheriff's Office helicopters with Forward Looking Infrared (FLIR) send a real-time microwave video downlink of ongoing events to commanders and other decision-makers on the ground, facilitating specialized radio tracking equipment to locate bank robbery suspects and provides a platform for aerial photography and digital video of large outdoor locations (e.g., crime scenes and disaster damage, etc.).
SPD	Situational Awareness Cameras Without Recording	CB 120054 (passed by Council on 5/24/21)	Non-recording cameras that allow officers to observe around corners or other areas during tactical operations where officers need to see the situation before entering a building, floor or room. These may be rolled, tossed, lowered or throw into an area, attached to a hand-held pole and extended around a corner or into an area. Smaller cameras may be rolled under a doorway. The cameras contain wireless transmitters that convey images to officers.

Group Four Technology Review

GROUP 4A

Department	Technology	SIR Council Bill	Description
SPD	Callyo	CB 120753 (passed by Council on 4/16/24)	This software may be installed on an officer's cell phone to allow them to record the audio from phone communications between law enforcement and suspects. Callyo may be used with consent or search warrant.
SPD	Audio Recording Systems	CB 120307 (passed by Council on 5/17/22)	A hidden microphone to audio record individuals without their knowledge. The microphone is either not visible to the subject being recorded or is disguised as another object. Used with search warrant or signed Authorization to Intercept (RCW 9A.73.200).

GROUP 4B

Department	Technology	SIR Council Bill	Description
SPD	Camera Systems – Images or Non Auditory Video Recordings	CB 120499 (passed by Council on 2/28/23)	A hidden camera used to record people without their knowledge. The camera is either not visible to the subject being filmed or is disguised as another object. Used with consent, a search warrant (when the area captured by the camera is not in plain view of the public), or with specific and articulable facts that a person has or is about to be engaged in a criminal activity and the camera captures only areas in plain view of the public.
SPD	Tracking devices	CB 120504 (passed by Council on 2/28/23)	A hidden tracking device carried by a moving vehicle or person that uses the Global Positioning System to determine and track the precise location. U.S. Supreme Court v. Jones mandated that these must have consent or a search warrant to be used.
SPD	Remotely Operated Vehicles (ROVs)	CB 120503 (passed by Council on 2/28/23)	These are SPD non-recording ROVs/robots used by Arson/Bomb Unit to safely approach suspected explosives, by Harbor Unit to detect drowning victims, vehicles, or other submerged items, and by SWAT in tactical situations to assess dangerous situations from a safe, remote location.
SPD	Computer, cellphone and mobile device extraction tools	CB 120501 (passed by Council on 2/28/23)	Forensic tools used with consent of phone/device owner or pursuant to a warrant to acquire, decode, and analyze data from smartphones, tablets, portable GPS device, desktop and laptop computers.
SPD	Hostage Negotiation Throw Phone	CB 120754 (passed by Council on 4/16/24)	A set of recording and tracking technologies contained in a phone that is used in hostage negotiation situations to facilitate communications.

Appendix A: Retroactive Technology Identification Methodology

The following steps were taken to complete the Master List requirement.

1. The Mayor's Office sent a City-wide email to notify City staff, department leaders, and privacy champions that the surveillance audit and inventory of technologies was required.
2. The Chief Privacy Officer presented the process and timeline to City executives and leaders to request resources and cooperation.
3. Privacy staff met with departments individually to discuss the overall process, discuss specific technologies, and make determinations about Master List technology inclusion.
4. Privacy champions and staff were provided with the surveillance checklist (see below) to assist in identifying surveillance technologies that meet Surveillance Ordinance requirements.
5. The list of technologies was validated against selection criteria and reviewed by the Chief Technology Officer prior to submission.

Appendix B: Surveillance Criteria

Surveillance Master List Questionnaire

Does the technology meet the following definition?

- Technology whose primary purpose is to observe or analyze the movements, behavior, or actions of identifiable individuals in a manner that is reasonably likely to raise concerns about civil liberties, freedom of speech or association, racial equity or social justice. Identifiable individuals also include individuals whose identity can be revealed by license plate data when combined with any other record.

Do any of the following exclusion criteria apply?

- Technology that is used to collect data where an individual knowingly and voluntarily provides the data.
- Technology that is used to collect data where individuals were presented with a clear and conspicuous opt-out notice.
- Technologies used for everyday office use.
- Body-worn cameras.
- Cameras installed in or on a police vehicle.
- Cameras installed pursuant to state law authorization in or on any vehicle or along a public right-of-way solely to record traffic violations.
- Cameras installed on City property solely for security purposes.
- Cameras installed solely to protect the physical integrity of City infrastructure, such as Seattle Public Utilities reservoirs.
- Technology that monitors only City employees in the performance of their City functions.

Do any of the inclusion criteria apply?

- The technology disparately impacts disadvantaged groups.
- There is a high likelihood that personally identifiable information will be shared with non-City entities that will use the data for a purpose other than providing the City with a contractually agreed-upon service.
- The technology collects data that is personally identifiable even if obscured, de-identified, or anonymized after collection.
- The technology raises reasonable concerns about impacts to civil liberty, freedom of speech or association, racial equity, or social justice.

To require a Surveillance Impact Review and inclusion on the Master List, the technology in question must meet the definition of surveillance, have no exclusion criteria and at least one inclusion criteria.