2025

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.

Surveillance Impact Report (SIR) Status

In 2024, the original 28 retroactive technologies identified on the initial Master List of Surveillance Technologies were completed through 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). Sixteen of the technologies were removed, resulting in a Master List with twelve technologies.

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.

- 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.
- Council Bill 120025 (Seattle Police Department Automated License Plate Recognition (ALPR)) originally passed on April 19, 2021, completed the material update process, with the City Council passing new Council Bill 120778 on June 18, 2024.
- Council Bill 120504 (Seattle Police Department Tracking Devices SIR) originally passed on February 28, 2023, completed the material update process, with City Council passing new Council Bill 120994 on June 17, 2025.
- 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.
- 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.

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. As part of the 2025 SIR material update process, the Community Surveillance Working Group received notification of the three SIR material updates: 1) Tracking Devices, 2) Closed-Circuit Television Camera Systems, and 3) Real-Time Crime Center software.

SMC 14.18 does not require material updates to go through the same process as the initial SIR and the Working Group was not required to complete another privacy and civil liberties impact assessment for a material update. From January to September 2025, no new technology determined to be surveillance technology required a surveillance impact report to be completed. As a result, the process does not require Working Group consultation for the SIR privacy and civil liberties impact assessment this year.

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.

Link to 2024 Clerk File 323175
Link to 2023 Clerk File 322804
Link to 2022 Clerk File 322426
Link to 2021 Clerk File 322100
Link to 2020 Clerk File 321784
Link to 2019 Clerk File 321423

Staff'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 2025, no new technology submitted by departments and reviewed through the City's Privacy and Surveillance Assessment process were determined to be surveillance technologies that would require the completion of a Surveillance Impact Report and Racial Equity Toolkit. However, the Seattle Police Department completed the SIR material update process for three previously adopted SIR technologies: 1) Tracking Devices, 2) Closed-Circuit Television Camera Systems (CCTV), and 3) Real-Time Crime Center (RTCC) software. The Community Police Commission and the Office for Civil Rights outlined concerns about the City's plan to expand the public safety cameras program. The Chief of Police responded to the concerns and sent a memorandum concerning the proposed expansion of public safety cameras and an explanation of safeguards in place to members of the City Council on September 7, 2025.

The Real-Time Crime Center was launched on May 20, 2025, and has played a role in investigating reported incidents and active criminal investigations. Moving forward, both CCTV and RTCC will be part of this equity report and ITD will work closely with SPD in preparing the September 2026 equity report once we have a full year of data to evaluate. Please review the initial information provided by SPD under

the Equity Reporting for Technologies on the Master List section on page 16. Furthermore, the City's Office of Inspector General has hired independent academic experts to evaluate the RTCC and the Police Department's use of the RTCC, CCTV cameras, and Automated License Plate Readers. The evaluation team is led by Principal Investigator Anthony Braga and Co-Principal Investigator Lisa Barao at the University of Pennsylvania's Crime and Justice Policy Lab.

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.*

Please consult the 2024 report to see previous recommendations.

After eight 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 City Council to reexamine and reimagine the surveillance ordinance.

As one example, many municipalities across the country utilize the Community Control Over Police Surveillance (CCOPS) model from the American Civil Liberties Union (ACLU). Results have generally been positive with involvement of law enforcement and communities engaging in discussion on appropriate technology usage. The differences in this model are primarily in the administration and logistics of the ordinance. This includes a clearer definition and list of exemptions, as well as an emphasis on how the auditing and oversight functions shall operate. The burdens of compliance are spread across entities rather than solely focused within one department. Other and newer approaches are worth study and consideration.

Additionally, with new surveillance technologies in scope for the annual Equity Report, staff recommends departments consider leveraging mechanisms to further evaluate impacts of surveillance technology deployments, uses, and engagement and outreach practices longitudinally. Effectiveness come from the combination of the technology and its use in community. Hence, Seattle's emphasis should be on evaluating trends in equity impacts over time.

For example, SPD's fleetwide expansion of ALPR can serve as an opportunity to report improvements to crime and response outcomes, as well as to leverage metadata or other information inherent in the ALPR system (e.g., transformed, aggregated, and/or statistically processed non-personal data). With this practice, the City can evaluate both the efficacy of the tools and equity impacts over time associated with use and expansion. Related, proven privacy-protective approaches, sufficient to preserve the informational value of the data while ensuring personal information such as license plates numbers or other data that may be used to identify a person remains protected, can be developed with the community, developing necessary public trust through greater transparency and ongoing expression of Seattle values in the City's use practices.

These approaches improve our understanding of scope and scale of impacts and inform service delivery in a way that supports more equitable outcomes in our communities. Additionally, this enables City departments to ensure we are meeting continuous improvement goals in service to the public.

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.*

Staff has no 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.

As part of this year's annual report, staff will file a companion updated September 2025 Master List of Surveillance Technologies. The following reporting from departments are only for SIR technologies listed on the updated September 2025 Master List.

Seattle Department of Transportation:

Closed Circuit Television Equipment "Traffic Cameras"

The Seattle Department of Transportation (SDOT) currently operates 362 Closed Circuit Television (CCTV) traffic cameras across the city.

The impact of Closed Circuit Television (CCTV) camera distribution on equitable outcomes is challenging to assess because of the following considerations:

- An increase in camera coverage increases the degree to which populations in the area and those traveling through are surveilled;
- An increase in camera coverage increases the degree to which the Seattle Department of Transportation can provide services and manage incidents impacting the safety of those populations; and
- Third parties may record and store these feeds for a variety of uses.

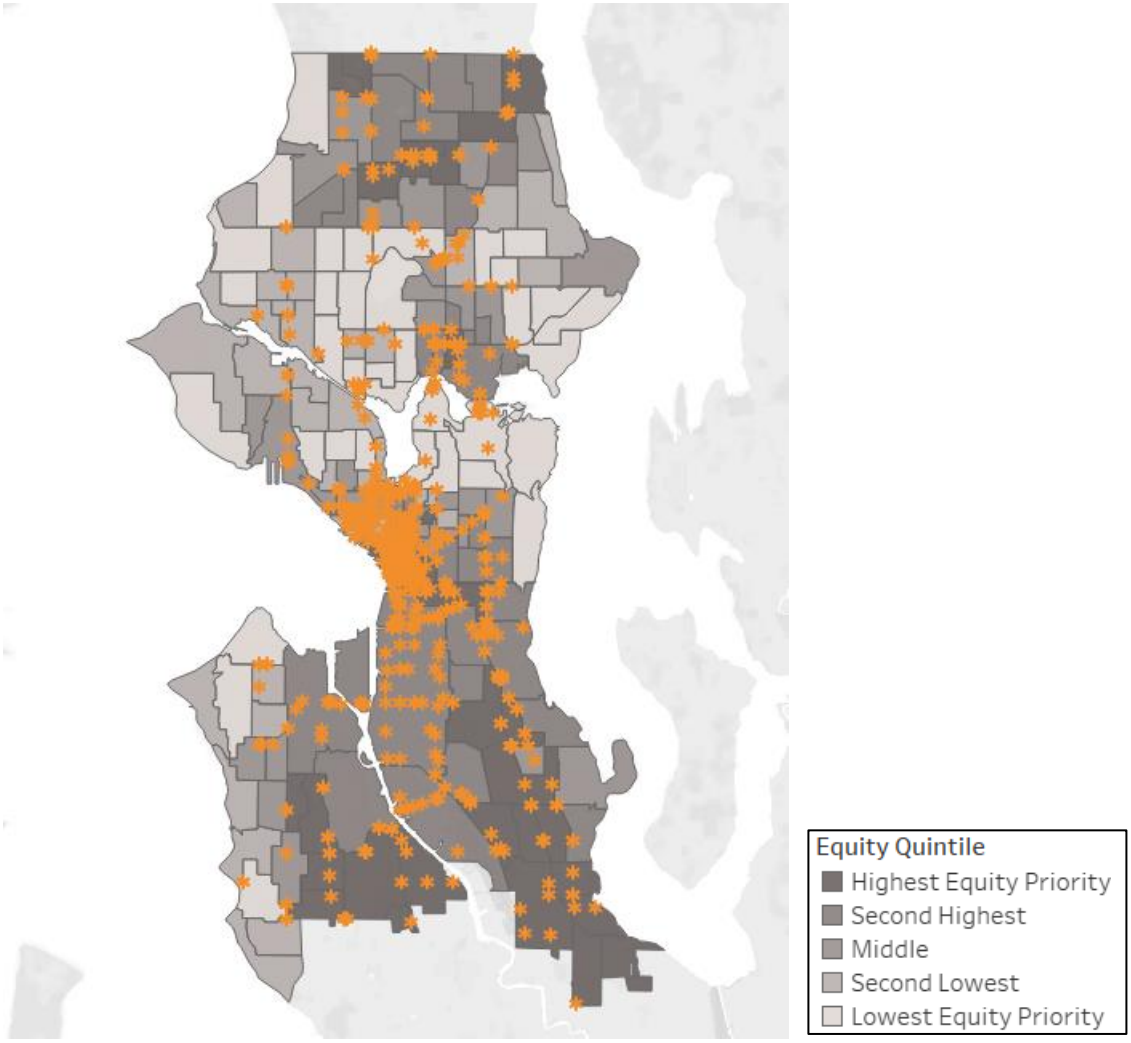
Historically, SDOT has prioritized the installation and activation of CCTV traffic cameras to best inform traffic system timing and to address topographical challenges in network monitoring. More recently, staff has sought to incorporate anonymized demographic data alongside multi-modal and high-injury network data to inform decision making around future camera placement. From the perspective of increasing SDOT's ability to provide comprehensive traffic monitoring and incident management, staff is looking at four primary 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 High Injury Network

To assess the degree to which the department can provide equitable services using our CCTV network, staff has 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, staff typically group the census tracts into quintiles: Highest Equity Priority (most historically disadvantaged), Second Highest, Middle, Second Lowest, Lowest Equity (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

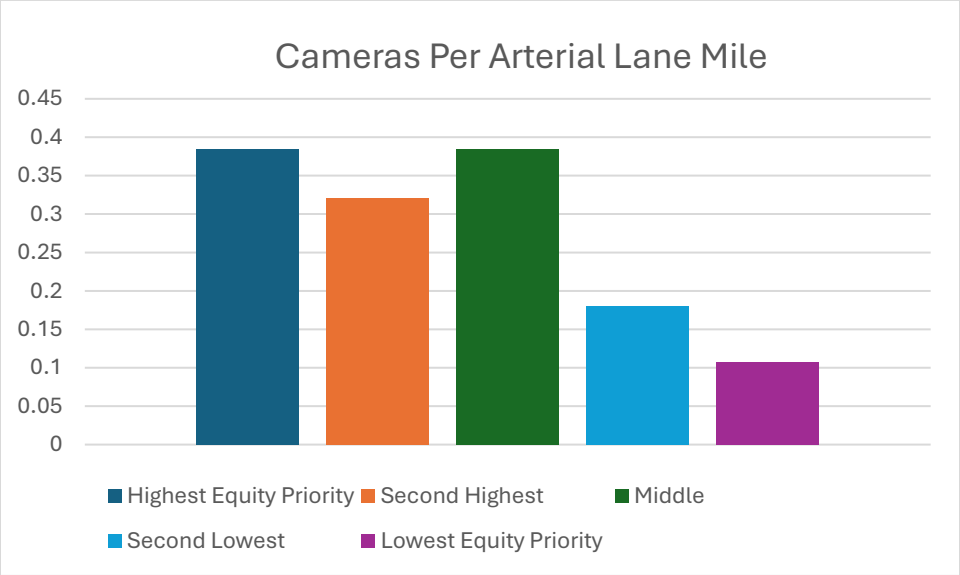


Fig. 3

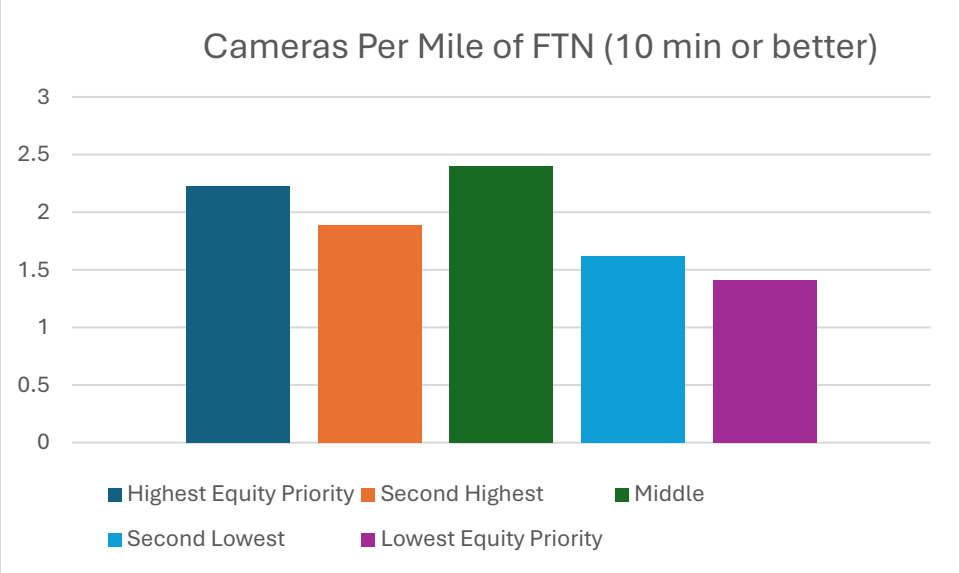


Fig. 4

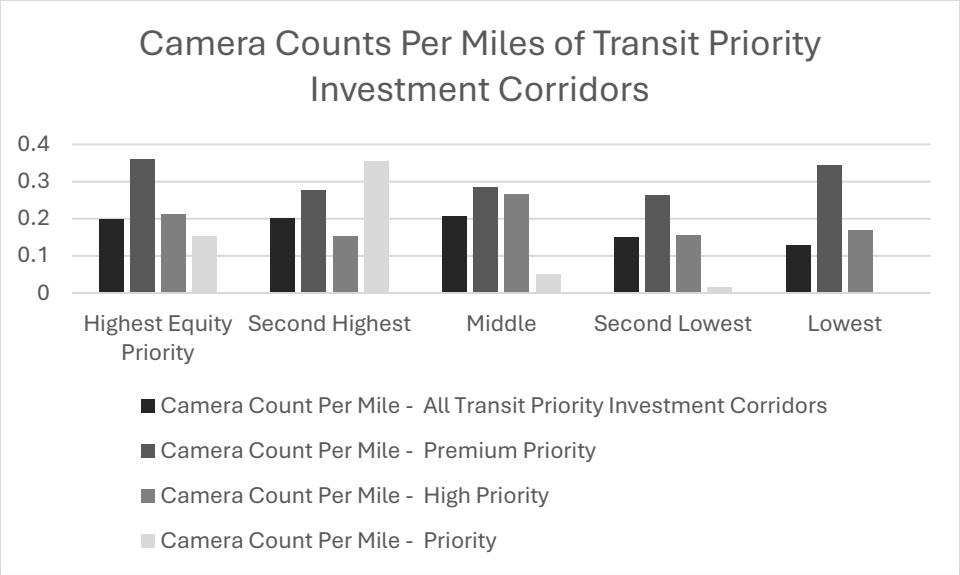
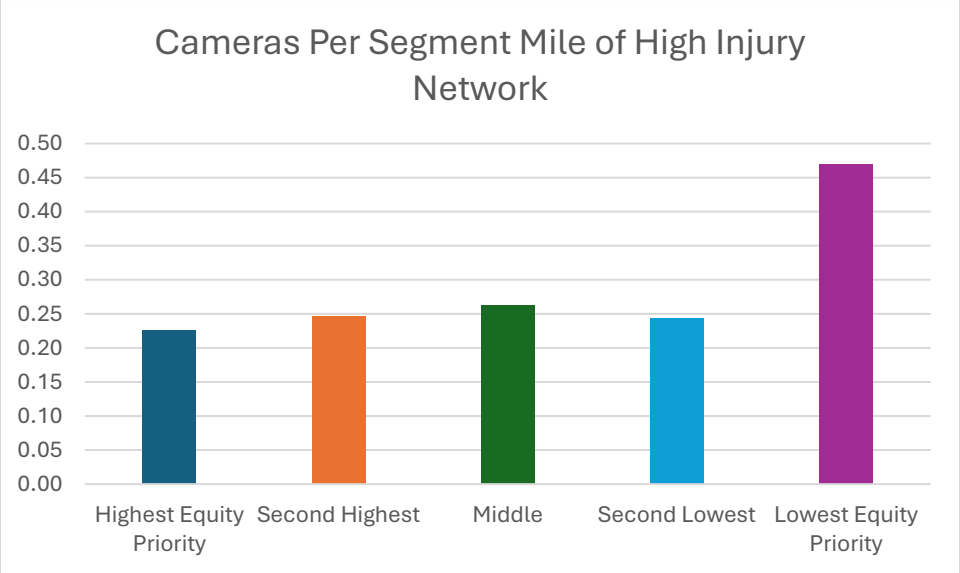


Fig. 5



The distributions in *Figure 2* and *Figure 3* indicate that our historical investments have resulted in a higher degree of camera coverage and observational capacity on high-volume and frequent transit streets in higher-priority equity areas. This aligns with SDOT's traditional prioritization schema.

The distributions in *Figure 4* and *Figure 5,* however, reflect an opportunity to further refine and target our future investments in CCTV coverage. *Figure 4* indicates that there is room to increase the percentage of cameras in our highest priority transit corridors, especially within the second-highest equity quintile, while also indicating that the third-tier "priority" transit corridors within our middle, second-lowest, and lowest equity quintiles may also benefit from additional CCTV investment. *Figure 5* indicates that, while we have a high degree of camera coverage per mile of High Injury Network in our

highest equity quintiles, injuries are occurring outside of camera-coverage areas at a higher rate in these quintiles than in our lowest priority areas. When assessing potential locations for new camera installation, we plan to use both transit investment priority corridors and high-injury network areas as influencing factors moving forward. Additional supplemental analysis may also include breaking out the three tiers of our High Injury Network (i.e., High, Medium, Low) and assessing the quintile distributions within each tier.

Seattle Police Department:

Automated License Plate Readers (ALPR) (Patrol)

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 records 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)

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.

Since this technology has only been in operation for a limited amount of time, not enough data exists to do an accurate analysis. 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.

With just three months of operation, data is limited but no significant counterindications have been observed. Data from RTCC is now being captured through the use of a "RTCC Report" configured in the SPD Records Management System. These 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 2025. Additionally, 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.

Since this technology has only been in operation for a limited amount of time, not enough data exists to do an accurate analysis. 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.

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.