



Surveillance Impact Report

Body-Worn Cameras
Recreation and Parks

As required by San Francisco Administrative Code, Section 19B, departments must submit a Surveillance Impact Report for each surveillance technology to the Committee on Information Technology ("COIT") and the Board of Supervisors.

The Surveillance Impact Report details the benefits, costs, and potential impacts associated with the Department's use of Body-Worn Cameras.

DESCRIPTION OF THE TECHNOLOGY

The Department's mission is to provide enriching recreational activities, maintain beautiful parks and preserve the environment for the well-being of our diverse community.

In line with its mission, the Department uses Body-Worn Cameras to protect the public and our staff in our parks, playgrounds and at special events. The Department can review footage for improvements in response or for training opportunities.

The Department shall use Body-Worn Cameras only for the following authorized purposes:

- Recording video and audio footage in the event of an incident. Incidents can be:
 - o Actual or potential criminal conduct
 - o Situation when a Park Ranger reasonably believes recordings of evidentiary value may be obtained
 - o Calls for service involving a crime where the recording may aid in the apprehension/prosecution of a suspect
- Providing recording to law enforcement or other authorized persons upon request.

Any use(s) not identified in the Authorized Use(s) above are strictly prohibited.

Department technology is located on a park ranger. The Park Ranger must wear the body worn camera affixed to their uniform in a manner most conducive to recording both audio and video at all times. Body worn cameras are typically worn on the front of the uniform's outermost garment facing forward. Park Ranger are deployed on Park property.

Surveillance Oversight Review Dates

COIT Review: October 21, 2021

Board of Supervisors Review: TBD

Technology Details

The following is a product description of Body-Worn Cameras:

- Axon Body 2 and 3 - Body Worn Cameras (BWCs): Axon Body 3 isn't just a camera: it's a rugged communications beacon front-and-center on every call. Featuring enhanced low-light performance, reduced motion blur and an LTE connection that enables real-time features like live streaming, Body 3 empowers officers with more support in the moment.

A. How It Works

To function, a Body-Worn Camera (hereinafter referred to as "surveillance technology") is a device worn by a law enforcement officer that makes an electronic audio and video recording of activities that take place during any law enforcement action. In order to function, the Park Ranger turns the body worn camera on and off. Once a Park Rangers activates the body worn camera, he/she must make every reasonable effort to have the device remain on until the incident has concluded. Park Rangers download the recordings which are saved on Evidence.com.

All data collected or processed by Body-Worn Cameras will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by Evidence.com to ensure the Department may continue to use the technology.

IMPACT ASSESSMENT

The impact assessment addresses the conditions for surveillance technology approval, as outlined by the Standards of Approval in San Francisco Administrative Code, Section 19B:

1. The benefits of the surveillance technology outweigh the costs.
2. The Department's Policy safeguards civil liberties and civil rights.
3. The uses and deployments of the surveillance technology are not based upon discriminatory or viewpoint-based factors and do not have a disparate impact on any community or Protected Class.

The Department's use of the surveillance technology is intended to support and benefit the residents of San Francisco while minimizing and mitigating all costs and potential civil rights and liberties impacts of residents.

A. Benefits

The Department's use of [Technology name] has the following benefits for the residents of the City and County of San Francisco:

- Public safety - Protect safety of residents while promoting an open, safe and welcoming environment
- Criminal justice - Providing recording to law enforcement or other authorized persons upon request.

B. Civil Rights Impacts and Safeguards

The Department has considered the potential impacts and has identified the technical, administrative, and physical protections as mitigating measures:

The San Francisco Recreation and Park Department strives to mitigate all potential civil rights impacts through responsible technology and associated data use policies and procedures. The Department intends to use body-worn cameras and their associated data exclusively for the authorized uses cases. All other uses, including surveillance of San Francisco residents or groups, are expressly prohibited.

The administrative, technical and physical safeguards are described below:

- Administrative Safeguards: The potential impacts noted above will be included in the Departmental Body Worn Camera policy which will be administered and managed by the Chief Park Ranger. All requests for body worn camera data will be captured in a request management software solution. Data will include approved requestors of surveillance data, and inventory of all requests for Surveillance data. In addition, there will be knowledge articles describing step by step instructions on how to collect and send the data to the requestor.
- Technical Safeguards: Body worn camera data can be accessed only by the Chief Park Ranger or designee. Data is stored on Evidence.com in the cloud. Violation of the policy will be subject to standard RecPark departmental policies, which may include disciplinary action up to and including termination.
- Physical Safeguards: <p>Data is securely stored on Evidence.com in the cloud.

C. Fiscal Analysis of Costs and Benefits

The Department's use of Body-Worn Cameras yields the following business and operations benefits:

- Staff Safety - Ensure more accountability of actions of staff
- Financial and Time Savings - Recording available so no need to do individual assessment for any incidents

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

- Number of FTE (new & existing): Park Rangers (8210) [One FTE/ year - 20%]
- The one-time costs are:
 - Total Salary & Fringe: 0
 - Software: 0
 - Hardware/ Equipment: \$700 per camera - 50 cameras, \$1500 per charger - 10 chargers
 - Professional Services: 0
 - Training: 0
 - Other: 0
- The annual costs are:
 - Total Salary & Fringe: \$15,000
 - Software: \$12,000 for all cameras for licensing and storage

- Hardware/ Equipment: 0
- Professional Services: 0
- Training: 0
- Other: 0

The Department funds its use and maintenance of the surveillance technology through operational funds.

COMPARISON TO OTHER JURISDICTIONS

Body-Worn Cameras are currently utilized by other governmental entities for similar purposes.