



Surveillance Impact Report

Security Cameras with CCTV software
Animal Care and Control

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 Security Cameras with CCTV software, (hereinafter referred to as "surveillance technology").

PURPOSE OF THE TECHNOLOGY

The Department's mission is:

The San Francisco Department of Animal Care & Control (SFACC) is a taxpayer-funded, open-admission animal shelter. Since 1989, SFACC has provided housing, care, and medical treatment to wild, exotic and domestic stray, lost, abandoned, sick, injured, and surrendered animals. SFACC's doors are open to all animals in need regardless of species, medical, or behavioral condition. The shelter also enforces all state and local Animal Control and Welfare laws and is the first responder for animals in natural disasters and citizen emergencies. SFACC shelters homeless, neglected, and abused animals and offers a variety of services to the community. SFACC is the local City agency that investigates animal cruelty, abuse or neglect, enforces animal welfare laws, rescues wildlife and wild birds in distress, and aids domestic animals in need. SFACC aims to adopt, rehome, or reunite domestic animals with their guardians and release wildlife to their native habitat.

The surveillance technology supports the Department's mission and provides important operational value in the following ways:

The technology ensures that all animals housed on-premises are safe from theft, cruelty, abuse, or neglect while in care. Additionally, it aids with internal incident investigations, allegations of mistreatment on-site, and crimes against the organization. The cameras are also used to protect the facility against vandalism.

The Department shall use the surveillance technology only for the following authorized purposes:

Authorized Use(s):

- To help ensure staff safety by reviewing situations as they're happening to assess the level of threat and determine if we need law enforcement support. Our animal control officers are unarmed and are not trained or equipped to deal with human aggression. These are events that require immediate action.*

Surveillance Oversight Review Dates

PSAB Review: TBD 1/27/2023

COIT Review: TBD (list all dates at COIT, and write "Recommended: MM/DD/202X" for rec date)

Board of Supervisors Approval: TBD

– To view public behavior that may endanger the animals in our care. In our previous building, animals were stolen on four separate occasions in the two years before the pandemic. We needed to quickly assess who might be involved and where the animals might be.
– To document crimes against the department, mostly graffiti and property destruction, so we can report that to the police
– To review employee actions to determine whether procedures were followed.
– To monitor building performance.

Surveillance technology may be deployed in the following locations, based on use case:

The cameras (60) are located throughout the 1419 Bryant St. property - both in public and staff-only areas - as well as on the exterior of the building on Alameda and Bryant streets and at entry/exit points, gates and driveways.

Description of Technology

This is a product description of the technology:

- Avigilon Video Security Cameras.
- Avigilon 8.0-H4A-DP1-IR Fixed camera.
- Avigilon 6.0L-H4F -DO1-IR Fixed camera with fisheye lens

This is a description of how the technology works:

The cameras are motion activated and record events. A few Cameras in critical operational areas record full frame video. There are two locations (with highly visible posted signage) that also record audio (intake lobby, public hearing room) because of the potential, and demonstrated, emotional volatility of interactions in these locations.

Third-Party Vendor Access to Data

Data collected or processed by the surveillance technology will not be handled or stored by an outside provider or third-party vendor on an ongoing basis. The Department will remain the sole Custodian of Record.

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 the surveillance technology has the following benefits for the residents of the City and County of San Francisco:

	Benefit	Description
<input type="checkbox"/>	Education	
<input type="checkbox"/>	Community Development	
<input type="checkbox"/>	Health	
<input type="checkbox"/>	Environment	
X	Criminal Justice	Video footage allows us to document graffiti and other damage to the building and refer that to San Francisco Police Department for possible prosecution. Graffiti removal is costly to the taxpayers.
<input type="checkbox"/>	Jobs	
<input type="checkbox"/>	Housing	
X	Other: Public Safety, Animal Welfare	We have had to evacuate the building when a member of the public broke in through a locked door. We were able to safely escort members of the public out through the back of the building and away from the threat because we were able to use the cameras to determine that the only problem was at the front of the building. The cameras also allowed people still in the building to be alerted to the arrival of the police and the end to the threat. We house 100-250 animals per day with 50 staff and 150 volunteers. The cameras help us review reported incidents so that we can determine if our standards of care were violated. Recently, reviewing footage enabled us to determine that a volunteer was violating our code of conduct in regards to proper dog handling. We were also able to review footage to determine how a dog escaped its enclosure which led to a dog fight. Our animal population is vulnerable and cannot tell us in words if there's a problem. They depend on us to be vigilant and investigate problems.

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:

Dignity Loss: It is possible for the use of surveillance cameras to result in Dignity Loss in circumstances in which someone may be misidentified and accused of a crime, as well as someone being inadvertently recorded in a momentary embarrassing situation on video being used to investigate a crime or safety incident. All facility video cameras are in public places

Discrimination: Anyone unintentionally misidentified as a suspect as a result of the review of recorded video during a crime investigation could end up being treated unfairly by law enforcement and could, while under arrest, for example, experience denial of their civil rights.

Economic Loss: In the event of the misidentification of a suspect based on a criminal investigation that includes surveillance video recordings, it is possible an innocent person may be improperly exposed to arrest or detainment, which may include fees and result in economic loss to the individual.

Transactions may be recorded however personal payment information is not accessible via this technology.

Loss of Autonomy: Anyone placed under arrest as a result of a criminal investigation determining their identity based on video recordings would, at least temporarily, not have control over how their personal information is used or processed. This technology does not independently generate information that identifies vehicle occupants, license plate information can be used to determine the registered owner. In addition, vehicle occupants or those in the immediate surroundings may be pictured. As a result, it is possible that individuals with access to this data could do additional research to identify the individual.

Loss of Liberty: In the event of the misidentification of a suspect based on a criminal investigation that includes surveillance video recordings, it is possible an innocent person may be improperly exposed to arrest or detainment.

Physical Harm: Video surveillance technology itself does not cause physical harm or death.

Loss of Trust: There would not be Lost of Trust since recordings are kept in a secure location. While all staff at SFACC can see real-time video, recordings are accessible by only seven people who would retrieve video only under very specific circumstances. If determined necessary, video will be provided to SFPD for criminal investigation and would be handled by them according to all applicable laws.

The administrative safeguards are that access to surveillance recordings is limited to seven high level staff (Director, Deputy Director, Operations Manager, Field Services Captain, Field Services Assistant Supervisors, Principal Analyst) who adhere to a policy of reviewing video if and only if it is determined a safety or criminal incident calls for such action.

The technical safeguards are that all Video Recordings are stored in access card-controlled locations. Access to video is password-protected and passwords are only assigned to individual, documented, approved staff. Video is stored in a format that requires a manufacturer specific software to play files and export footage.

The physical safeguards are that all Video Recordings are stored on site in access card-controlled locations. Access to video is password protected and passwords are only assigned to individual,

documented, approved staff. Recordings are only able to be accessed by individual work stations of the assigned staff and in locked offices when they are not present.

C. Fiscal Analysis of Costs and Benefits

The Department’s use of the surveillance technology yields the following business and operations benefits:

	Benefit	Description
<input type="checkbox"/>	Financial Savings	
<input type="checkbox"/>	Time Savings	
X	Staff Safety	Our cameras are critical to staff safety. It is common for people trying to claim, look for, or surrender animals to become quite emotional, even violent. This is particularly true for people whose animals are being held as part of an investigation or for enforcement of the pit bull spay/neuter ordinance. The cameras allow us to see what happened just before the confrontation started and establish whether there are other possible participants who are not in immediate view. This all helps us determine whether we need to call for police assistance. When police do arrive the footage helps confirm what happened.
<input type="checkbox"/>	Data Quality	
X	Other: Animal Welfare	We house 100-250 animals per day with 50 staff and 150 volunteers. The cameras help us review reported incidents so that we can determine if our standards of care were violated. Recently, reviewing footage enabled us to determine that a volunteer was violating our code of conduct in regards to proper dog handling. We were also able to review footage to determine how a dog escaped its enclosure which led to a dog fight. Our animal population is vulnerable and cannot tell us in words if there's a problem. They depend on us to be vigilant and investigate problems

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

Number of Budgeted FTE (new & existing) & Classification	Service, maintenance and operations of security cameras are maintained by Real Estate Department (RED) staff Media
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	Security Services division: 1777 Media/Security systems specialist, 1781 Media/Security systems supervisor	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost	N/A	N/A

The Department funds its use and maintenance of the surveillance technology through no supplementary funds.

COMPARISON TO OTHER JURISDICTIONS

The surveillance technology is currently utilized by other governmental entities for similar purposes.

Other government entities have used the surveillance technology in the following way: Video surveillance has been utilized by other governmental entities in similar context and for the same purposes - property and personnel security, public safety, monitoring operations, in of criminal activity, and facilities oversight. This includes local, state, and federal entities. Common uses of video surveillance include observing the public at the entry to large venues, public transportation (train platforms, airports, etc.), and around the perimeter of secure facilities, especially those that are directly bounded by community spaces.

The effectiveness of the surveillance technology while used by government entities is determined to be the following: Video surveillance provides leadership and security personnel with advance notice of breaches in security, threats to public safety, and is a way to protect personnel and assets - in this case, animals that cannot serve as witnesses to safety or security incidents. It is a critical subsystem for any comprehensive security plan, especially in a facility that lacks on-site security staff. In combination with defensible space and monitoring of smaller areas, security cameras have been shown to be effective at deterring criminal activity*. *Effectiveness and Social Costs of Public Area Surveillance for Crime Prevention.*” Brandon Welsh and David P. Farrington, and Sema A. Taheri. Annual Review of Law and Social Science. Vol. 11. 2015. pp. 111-130.

The adverse effects of the surveillance technology while it has been used by other government entities are:

	Effect	Description
<input type="checkbox"/>	Unanticipated Costs	
<input type="checkbox"/>	Failures	
X	Civil Rights and/or Civil Liberties Abuse	As with any surveillance technology, adverse effects can include the loss of privacy, the possibility of abuse, and the potential for misidentification by law enforcement personnel. Many instances to learn from are included in the ACLU's <i>Making Smart Decisions About Surveillance: A Guide for Community Transparency, Accountability & Oversight</i>
<input type="checkbox"/>	Other	