



Committee on Information Technology

Office of the City Administrator

Minutes

Privacy and Surveillance Advisory Board Meeting City and County of San Francisco

Friday, September 11, 2020
9:00 am – 11:00 am

To view the online presentation, join the meeting using the link below:

<https://ccsf.webex.com/ccsf/onstage/g.php?MTID=e45c179b1a786b4f5e957b44d5c5c1e20>

If you wish to offer public comment, call in using the number +1-408-418-9388 and access code 146 707 7684

A toll-free number is +1 415 655-0001

Coit.staff@sfgov.org can be used as an email address when joining the WebEx event

Members

Taraneh Moayed – Chair, Assistant Director, Office of Contract Administration
Mark de la Rosa – Acting Chief Auditor Executive, City Service Auditor, Controller's Office
Jason Lally – Data Services Manager, DataSF
Brian Roberts – Policy Analyst, Department of Technology
Todd Rydstrom – Deputy Controller, Controller's Office
Matthias Jaime – Director, Committee on Information Technology
Nnena Ukuku – Public Member

1. Call to Order by Chair

Ms. Taraneh Moayed called the meeting to order at 9:05am.

2. Roll call

Jason Lally
Brian Roberts
Matthias Jaime
Nnena Ukuku
Mark de la Rosa
Taraneh Moayed
Todd Rydstrom

COIT Staff

Emma Fernandez
Luke O'Neill

Department Representatives

Asja Steeves
Lt. Dave O'Connor
Matt Mason
Isidro Jimenez
Robert Aicardi
Shawn McCormick
Larry Stringer
Carla Short

3. Approval of Minutes from August 28, 2020 (Action Item)

The minutes of August 28, 2020 were approved without changes.

4. Review and Approval of Surveillance Technology Policy: Automated License Plate Reader (Discussion Item)

San Francisco Police Department (SFPD)

Ms. Asja Steeves presented on changes made to SFPD's automated license plate reader (ALPR) Policy and Impact Report. SFPD's ALPR policy now includes a description of prohibited use cases, which include using an ALPR alert on its own to identify an individual, using an ALPR alert on its own to substantiate law enforcement response or contact, and accessing SFPD's ALPR database for curiosity or political purposes. Further, SFPD's ALPR policy clarifies that ALPR scanning is limited to vehicles exposed to the public view and that ALPR-captured content constituting cause for police enforcement is limited to license plate, vehicle information, geolocation, and date and time of capture.

SFPD's ALPR policy now states that their retention schedule aligns with the Northern California Regional Intelligence Center (NCRIC) standard: 12 months except for if a record is connected to criminal investigation, in which case it may be retained for 5 years.

SFPD's ALPR policy now includes more information regarding compliance with the policy and sanctions for violations of the policy. Additionally, the policy now includes a description of when and how SFPD may access San Francisco Municipal Transportation Agency's (SFMTA) ALPR reads.

Finally, SFPD's ALPR Impact Report now includes a description of how ALPR vehicles are deployed, a definition of the Hotlist SFPD uses, a description of which Hotlist categories trigger an ALPR alert, a plan for annually reporting on ALPR use, and an image depicting SFPD ALPR patrol sectors.

SFPD's ALPR policy was approved unanimously with the following amendments:

- Define the terminology that is relevant to SFPD within the Policy and Impact Report (e.g., DOJ Stop-Felony-Want).
- Change the sentence regarding restricting use of manual ALPR look up to "No member shall access ALPR data for any use other than the authorized use cases herein."

San Francisco Municipal Transit Agency (SFMTA) - Parking Enforcement ALPR

Mr. Shawn McCormick presented on changes made to SFMTA's ALPR for Parking Enforcement Toolkit. These changes include a revision to authorized use case #3, which now includes mention of SFMTA's Hotlist being transmitted through a secure File Transfer Protocol (FTP). Further, SFMTA now lists digital images as a Level 3 data classification.

PSAB requested SFMTA to return to the next PSAB meeting with their Policy and Impact Report for potential approval.

San Francisco Municipal Transit Agency (SFMTA) - City-owned Parking Garages

Mr. Robert Aicardi presented on changes made to SFMTA's ALPR for City-owned Parking Garages Toolkit. These changes include a revision to authorized use case #2, which now states that SFMTA uses ALPR in City-owned parking garages to identify vehicles that are subject to an active investigation by the SFPD only if requested by SFPD who must provide a specific license plate number. Further, the Toolkit clarifies that no SFMTA fulltime employees are assigned to this operate this technology.

The Toolkit now lists ALPR digital images as data classification Level 3. Additionally, the Toolkit describes that parking vendors are assigned training regarding how to look up license plate information.

The Toolkit now states that ALPR information is shared with parking garage contractors (LAZ, ImPark/IMCO) but that they are only allowed access to time stamps on parking tickets. Additionally, the Toolkit now states that ALPR data will be purged at the end of the applicable retention period.

Finally, SFMTA described that ALPR cameras in City-owned Parking garages are angled in a way such that only license plate data is recorded, minimizing risk of dignity loss.

PSAB requested SFMTA to return to the next PSAB meeting with their Policy and Impact Report for potential approval.

Public Works (PW)

Mr. Larry Stringer presented on changes made to PW's ALPR Policy and Impact Report. The Policy now describes that the location of ALPR cameras is determined based on 311 calls, employee observations, and email complaints from constituents.

PW added to their ALPR Impact Report that authorization to review the ALPR footage comes from the Deputy Director of Operations in the form of written approval.

PW's ALPR policy was approved unanimously with the following amendments:

- Change data classification level of facial features and license plate information from 4 to 3.
- Add 'discouraging illegal dumping' to business justification for the technology.
- Provide on-site public noticing at ALPR sites.

5. Public Comment

There was no public comment.

6. Adjournment

The meeting adjourned at 10:46.