



# Surveillance Impact Report

Mayor's Office of Housing and Community Development  
Security Cameras

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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 surveillance cameras.

## DESCRIPTION OF THE TECHNOLOGY

We support San Franciscans with affordable housing opportunities and essential services to build strong communities.

In line with its mission, the Department shall use security cameras only for the following authorized purposes:

*Authorized Use(s):*

1. Live monitoring.
2. Recording of video and images in the event of an incident.
3. Reviewing camera footage.
4. Providing video footage/images to law enforcement or other authorized persons following an incident.

Prohibited use cases include any uses not stated in the Authorized Use Case section.

Further, processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, gender, gender identity, disability status, or an individual person's sex life or sexual orientation, and the processing of genetic data and/or biometric data for the purpose of uniquely identifying an individual person shall be prohibited.

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

Cameras are located in all garages, 2 facing the courtyard and installed in both laundry rooms onsite at the Midtown Park Apartments located at 1415 Scott St, SF, CA 94115. They capture regular activities of residents, visitors, and staff.

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## Surveillance Oversight Review Dates

COIT Review: TBD

Board of Supervisors Review: TBD

## Technology Details

The following is a product description:

Bosch IP DVR 5000

32 IP channels with 320 Mbps incoming bandwidth

12 MP IP camera support for view and playback

Real time live display for 16 channels @1080p or 4 channels @4k

Extended rack-mount unit with advanced connections

Separate internet and IP camera network.

### A. How It Works

To function, the surveillance cameras and connected recording device provide video recordings of any motion, including facial and bodies or moving objects. Recorded video will be reviewed only in the event of a crime or safety incident to determine if relevant video had been captured, and, if so, how to follow up accordingly.

Data collected or processed by security cameras 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 security cameras has the following benefits for the residents of the City and County of San Francisco:

- Education
- Community Development
- Health
- Environment

..	Criminal Justice	
..	Jobs	
..	Housing	
X	Other (Financial)	The cameras minimize the need for more 24-hour/7 days per week security staffing. In addition, they help prevent loss through theft, vandalism, and other criminal activity.
X	Other (Safety)	Surveillance cameras help provide security for Mercy Housing staff working on the property

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:

**Best completed by: Business Owner and Department Information Security Officer**

**Commented [1]:**  
Taken from Toolkit. Please delete the table when complete.

As part of the Surveillance Impact Report, the Acquisition of Surveillance Technology Ordinance includes the following requirement:

*"An assessment identifying any potential impact on civil liberties and civil rights and discussing any plans to safeguard the rights of the public;"*

The following section uses the draft National Institute of Standards and Technology (NIST) Privacy Framework to identify potential impacts that may result from the use of surveillance technologies. The 7 different impacts identified include:

- *Dignity Loss*: Includes embarrassment and emotional distress
- *Discrimination*: Unfair or unethical differential treatment of individuals or denial of civil rights
- *Economic Loss*: Direct financial losses as a result of identity theft or the failure to receive fair value in transaction due to misidentification, etc.
- *Loss of Autonomy*: Loss of control over decisions on how personal information is used or processed, or by whom it is used or processed
- *Loss of Liberty*: Improper exposure to arrest or detainment due to incomplete or inaccurate data
- *Physical Harm*: Physical harm or death
- *Loss of Trust*: Breach of implicit or explicit expectations or agreements about the processing of data, or failure to meet subjects' expectation of privacy for information collected.

**Tool:** Please refer to the *Surveillance Technology Impacts Defined* document for detailed definitions and impact examples.

**Instructions:** Your department's response should show that it has considered the above potential impacts and has thought through the technical, administrative, and physical\* protections that mitigate these impacts. If an impact does not apply, please detail why not, being sure to mention the applicable safeguards or technology/data limitations that make impact negligible or nonexistent.

**Helpful hint:** Department responses to toolkit questions 1.3, 1.5, 1.6, 3.8-2.9, 3.12-3.13, 3.16-3.18, 3.19, and 3.20 may be helpful in describing department mitigation strategies and safeguards.

\*Safeguards defined:

- *Administrative Safeguards*: Policies & procedures, such as documentation processes, roles and responsibilities, training requirements, data maintenance policies, and more.
- *Technical Safeguards*: Technical measures (i.e. encryption, pseudonymization, etc.) to properly secure data and systems from unauthorized access, whether at rest or in transit.
- *Physical Safeguards*: Measures to ensure data and data systems are physically protected, such as security systems, video surveillance, door and window locks, secured server and computer locations, and policies about mobile devices and removing hardware/software from certain locations.

1. Using the instructions above, describe how your department addresses the potential civil rights/liberties impacts associated with the surveillance technology.

Surveillance cameras, in this case, are used for security purposes only, not to surveil people in general. Only certain people have access to the recordings - the Property and Maintenance Managers, who adhere to a strict policy of accessing video only in cases in which there is a need to determine if criminal activity or a safety incident was captured.

Regarding impact and safeguards, see the following:

**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.

**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:**

There would be no direct Economic Loss to anyone captured on video as there are no commercial transactions involved.

**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.

**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 detention.

**Physical Harm:**

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

**Loss of Trust:**

There would not be Loss of Trust since recordings in this case are kept in a secure location and accessible by only two 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.

**Administrative Safeguards:**

Access to surveillance video recordings is limited to only two high level staff (Property Manager and Maintenance Manager) who adhere to a policy of reviewing video if and only if it is determined a criminal or safety incident calls for such action.

**Technical Safeguards:**

Recordings are password protected.

**Physical Safeguards:**

Recordings are located in a locked location accessible by only the Property and Maintenance Managers.

**C. Fiscal Analysis of Costs and Benefits**

The Department's use of surveillance cameras yields the following business and operations benefits:

<b>Benefit</b>	<b>Description</b>
X Financial Savings	The cameras minimize the need for more 24-hour/7 days per week security staffing. In addition, they help prevent loss through theft, vandalism, and other criminal activity.
.. Time Savings	
X Staff Safety	Surveillance cameras help provide security for Mercy Housing staff working on the property

.. Data Quality

The total fiscal cost, including initial purchase, personnel and other ongoing costs is Number of FTE (new & existing)		
Classification		
	<b>Annual Cost</b>	<b>One-Time Cost</b>
Software		
Hardware/Equipment		17000
Professional Services		134900
Training		
Other		
Total Cost		151900
2.1 Please disclose any current or potential sources of funding (e.g. potential sources = prospective grant recipients, etc.). <sup>SIR, ASR</sup>		

The Department funds its use and maintenance of the surveillance technology through MOHCD grants and/or loans.

**COMPARISON TO OTHER JURISDICTIONS**

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

## **APPENDIX A: Mapped Crime Statistics**

The general location(s) it may be deployed and crime statistics for any location(s),

[Toolkit 3.5]