



# Surveillance Impact Report

San Francisco International Airport ("Airport" or "Department")  
Tenant 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 San Francisco International Airport ("Airport" or "Department") use of digital recordings and data from third party security cameras.

## DESCRIPTION OF THE TECHNOLOGY

This impact assessment applies to the Airport's access to and use of digital recordings and other data from and the security cameras of the following entities:

- Airport airlines, concessionaires, food and beverage operators, and rental car agency tenants. ("Tenants")

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

*Authorized Use(s):*

1. Reviewing camera footage in the event of an incident.
2. Approving Tenant's disclosure of digital recordings and other data from its security camera system.

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.

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

Tenants' proprietary lease space.

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## Surveillance Oversight Review Dates

COIT Review: TBD

Board of Supervisors Review: TBD

## Technology Details

The following is a product description:

There are various types of camera technology used by the Tenants. During the application process Tenants are required to provide the Airport with camera make, model, and technical specifications as well as their security plan. Tenants are responsible for their hardware and the Airport does not maintain an inventory except as noted on the Tenants application form. Tenants are required to update the Airport on their inventory as change occurs.

### A. How It Works

Subject to the Airport Rules and Regulations, Tenants are allowed to install their own security cameras in their proprietary lease space. Tenants use these cameras to record live video within their proprietary lease space.

Handling or storage of data collected from or processed by Tenant's security camera system is solely the responsibility of Tenant.

Data Retention: Department may store and retain PII data shared by Tenant/Contractor only as long as necessary to accomplish a lawful and authorized purpose. Department data retention standards should align with how the Department prepares its financial records and should be consistent with any relevant Federal Emergency Management Agency (FEMA) or California Office of Emergency Services (Cal OES) sections.

The Department's data retention period and justification are as follows:

- One year, consistent with the Department's Data Retention Policy and state law; longer if necessary for an ongoing investigation or in anticipation of litigation.

PII data shall not be kept in a form which permits identification of data subjects for any longer than is necessary for the purposes for which the personal data are processed. PII data collected by the surveillance technology may be retained beyond the standard retention period only in the following circumstance(s):

- If necessary for an ongoing investigation or in anticipation of litigation.

Data may be stored in the following location:

- X Local storage (e.g., local server, storage area network (SAN), network-attached storage (NAS), backup tapes, etc.)
  - Department of Technology Data Center
  - Software as a Service Product
- X Cloud Storage Provider

Data Disposal: Upon completion of the data retention period, Department shall dispose of data in the following manner:

Practices:

- Automatic overwrite of all existing files when standard data retention period ends. This may take the form of a delete/reformat, wipe, overwrite of existing data, or degaussing.

## 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 Tenant'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 Tenants use of security cameras has the following benefits for the residents of the City and County of San Francisco:

- Education
- Community Development

X	Health	Protect safety of staff, patrons, and facilities while promoting an open and welcoming environment.
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- Environment

X	Criminal Justice	Review video footage after a security incident; provide video evidence to law enforcement or the public upon request by formal process, order, or subpoena.
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- Jobs
- Housing
- Other

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:

Airport’s use of recordings and data from third party security cameras is restricted to the identified Authorized Use Cases. Tenant’s disclosure of recordings and data from its own cameras is subject to the Airport Rules and Regulations and policies that restrict use of CCTV to the approved use in the Tenant Application. Tenants are required to report to the Airport any changes or modifications to video monitoring and/or recording device use prior to executing the changes or modifications.

Tenants are required to obtain Airport’s written authorization prior to the release of any video monitoring and/or recording device footage from Tenants cameras/devices. In appropriate cases, Airport may also request review and a determination of whether the footage may be disclosed from the Transportation Security Administration (TSA).

Further, Tenants approved camera use are audited as part of the Airport weekly and monthly audit of Tenants space. Airlines are also audited on an annual basis.

C. Fiscal Analysis of Costs and Benefits

The Department’s use of surveillance cameras yields the following business and operations benefits [Please customize chart below according to department circumstances]:

Benefit	Description
X	Financial Savings
	Tenants security Camera Systems will save on building or patrol officers.
X	Time Savings
	Tenants security Camera Systems will run 24/7/365, thus decreasing or eliminating building or patrol officer supervision.
X	Staff Safety
	Tenants security cameras help identify violations Patron Code of Conduct and provide assurance that staff safety is emphasized and will be protected at their place of employment.
X	Data Quality
	Security cameras run 24/7/365, so full-time staffing is not required to subsequently review footage of security incidents. Data resolution can be set by level and is recommended to be set to high resolution.

Number of FTE (new & existing)	Tenants cost to implement and support security cameras are not reported to Airport. Cost noted in this table reflect the Airport's cost for the approval and audit of Tenants use of the technology.  .45	
Classification	<ol style="list-style-type: none"> <li>1. 9212 – Aviation Security Analyst – 10%</li> <li>2. 9220 – Aviation Security Supervisor – 10%</li> <li>3. 0931 – Manager Aviation Security &amp; Regulatory Compliance – 10%</li> <li>4. 0933 - Director, Security, Emergency Management &amp; Communications – 10%</li> <li>5. 0943 - Managing Director, Safety, Security and Airside Services – 5%</li> <li>6. 0955 – Chief Operating Officer – 5%</li> </ol>	
	<b>Annual Cost</b>	<b>One-Time Cost</b>
Software		
Hardware/Equipment		
Professional Services		
Training		
Other – Salaries & Benefits	\$ 108,000	
<b>Total Cost</b>	<b>\$ 108,000</b>	

The Department funds its use and maintenance of the surveillance technology through Annual Operating funds. Tenants fund their use and maintenance of the surveillance technology.

**COMPARISON TO OTHER JURISDICTIONS**

Third Party Security Cameras are 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):

Tenants proprietary space across the Airport property.