

DRAFT FOR PAB CONSIDERATION

MEMORANDUM

DATE: [xxx]
FROM: City of San Diego Privacy Advisory Board
TO: The Honorable Council President Elo-Rivera and Members of the San Diego City Council
RE: San Diego Police Department's Proposal for Motion Activated Trail Cameras

I. RECOMMENDATION

The Privacy Advisory Board (PAB) recommends that the City Council approve the proposal with modifications as indicated below.

II. RECOMMENDED MODIFICATIONS

- A. **DATA SECURITY:** The Use Policy indicates that the SD card is physically locked but does not describe the robustness of these physical security measures.
- B. **DATA ACCESS:** The Use Policy does not indicate any kind of detailed logging mechanisms to track who accesses the data and for what purposes.
- C. **PUBLIC TRANSPARENCY:** The Use Policy does not describe how public access requests are handled or any transparency process for public scrutiny. Occasional reports, redacted where necessary to protect sensitive information, could enhance public trust
- D. **AUDITING AND OVERSIGHT:** The Use Policy discusses only supervisory oversight. The Use Policy should be expanded to include discussion of compliance audits by a party unrelated to the SWAT to ensure compliance with the noted policies and procedures.
- E. **MAINTENANCE:** The Use Policy contains neither information regarding how maintenance checks are conducted nor is the maintenance frequency mentioned. In addition, there is no mention of software or firmware updates for the technology.

For the above stated reasons, the Privacy Advisory Board respectfully recommends that the City Council **approve the proposal** with the modifications stated.

Cc: SDPD Chief Nisleit

Chloe Madison