

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 Power Over Ethernet Digital Video Recorders, Power Over Ethernet Network Video Recorders, and Power Over Ethernet Pan Tilt Zoom Video Cameras

I. RECOMMENDATION

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

II. RECOMMENDED MODIFICATIONS

- A. **DATA RETENTION:** The Use Policies mention erasure of data post-impoundment but do not specify retention periods for non-evidentiary video or detailed processes for data deletion.
- B. **DATA ACCESS:** The PTZ camera Use Policy mentions that some cameras are equipped with audio recording capabilities but does not provide guidelines on handling, disabling, or using this capability, which could lead to unintended privacy violations.
- C. **PUBLIC TRANSPARENCY:** The Use Policies do 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 Policies discuss only supervisory oversight. The Use Policies 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 Policies contain neither information regarding how maintenance checks are conducted nor is the maintenance frequency mentioned.

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

Cc: SDPD Chief Nisleit

Chloe Madison