



# Surveillance Impact Report

Taxi Dashboard Camera  
Municipal Transportation Agency

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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 limited video file(s) received from Taxi Dashboard Cameras.

## DESCRIPTION OF THE TECHNOLOGY

The Department’s mission is to connect San Francisco through a safe, equitable, and sustainable transportation system.

In line with its mission, the Department uses the video files from the Taxi Dashboard Cameras for the following: Taxi Dashboard Camera’s are owned by the taxi cab companies and are not governed by Department’s surveillance policies.

Taxis are one of several modes of transportation the Department regulates within the City. Taxi cab companies and other taxi permittees that operate in the City are subject to a number of requirements and conditions under Article 1100 (Regulation of Motor Vehicles for Hire) of Division II of the SF Transp. Code to ensure safety, equity of service, and sustainability among other goals.

The Department shall use the video data from Taxi Dashboard Cameras only for the following authorized purposes:

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| – Review recording of on-board incidents based upon complaints received from the public and at appeals hearing in response to a fine, suspension or response to fine revocation.  |
| – Review video data in response to complaints from the public to ensure compliance by taxi cab companies and other taxi permittees with requirements and conditions under Article 1100 (Regulation of Motor Vehicles for Hire) of Division II of the SF Transportation Code.  |
| – Review video data to confirm taxi cab companies and other taxi permittees complete rides paid for with public funds before paying the companies for those rides. For example, under its wheelchair program taxi incentive, the Department reviews video data from the technology to confirm that taxi cab drivers pick up individuals with certain disabilities before paying drivers for those rides, which are funded under various paratransit programs. |
| – Review video to investigate criminal acts involving taxi drivers or riders.   |

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## Surveillance Oversight Review Dates

COIT Review: April 21, 2022

Board of Supervisors Review: TBD

– Review video data to investigate accidents involving a taxi cab.

Any use(s) not identified in the Authorized Use(s) above are strictly prohibited.

## **Technology Details**

The following is a product description of Taxi Dashboard Cameras:

Of the many manufacturers taxi cab companies and other taxi permittees may choose from, Janus is the most commonly used. Janus Cam V1 HD offers a 120-degree lens with a wide range of vision, enabling drivers to capture events as wide as the street on which they travel as well as within the vehicle itself. The Janus V1 HD captures video in a number of resolutions, and backup capabilities allow images to be stored in JPEG, AVI, JDR, BMP and G-SENSOR. The Janus V1 HD is the perfect in-vehicle security camera for trucks, police cars, taxis, ambulances and other emergency vehicles, as well as, personal vehicles. Every Janus Cam comes with an easy to use, out-of-the-box software. Easily manage your event time stamps and categorize your clips. The software also comes with a built-in speedometer and a g-sensor graph.

### **A. How the Taxi Dashboard Camera Works.**

To function, Taxi Dashboard Cameras consist of one camera device with two lenses. The camera device is typically mounted behind the rearview mirror or in the upper portion of the windshield of the passenger side of the taxi cab and captures images in the cabin and on the road in front of the taxi cab. Video is saved to secure digital (SD) cards.

. The Department does not own the Dashboard Cameras inside the taxicab and has no control over how the data outside of department custody is handled or stored.

## **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 video data from the Taxi Dashboard Camera has the following benefits for the residents of the City and County of San Francisco:

- X Accessibility: Ensures consumer protection and public safety by allowing the Department to review incidents on board taxi cabs, including the behaviors and actions of drivers and riders after receiving incident reports from riders. Allows video audits of accessible trips subsidized by public funds
- X Criminal Justice: Ensures consumer protection and public safety by allowing the Department to review incidents on board taxi cabs, including the behaviors and actions of drivers and riders after receiving incident reports from riders or drivers, while also serving as a deterrent by recording incidents in the taxi cab. .
- X Health: Ensures consumer protection and public health by allowing the Department to review incidents on board taxi cabs, including the behaviors and actions of drivers and riders after receiving incident reports from riders.
- X Public Safety: Ensures public safety by allowing the Department to review incidents on board taxi cabs, including the behaviors and actions of drivers and riders after receiving incident reports from riders, as well as serving as a deterrent to drivers who may otherwise operate a vehicle in an unsafe manner.

## 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:

- Dignity Loss (e.g., embarrassment and emotional distress). Taxi cab drivers and riders may experience dignity loss if the surveillance technology records videos of them committing acts or experiencing situations that are embarrassing or distressing for them (e.g., altercations between drivers and riders, criminal acts) and those videos are released to the public.
  - o technical measures make this impact minimal because taxi cab companies store video files on secure digital (SD) cards, which are password protected and require proprietary software to view. This prevents unauthorized access to video; these images are only accessed when required under an authorized business case and are generally not available to the public.
  - o Administrative safeguards make this impact minimal because only designated Department staff have access to view video files, which occurs only under an authorized business case. SD cards are returned to the respective taxi cab company once Department review is complete, unless the video file becomes the subject of an appeal, an accident investigation or criminal investigation. Video files retained by the Department are generally not available to the public.

- Physical protections make this impact minimal because SD cards while in Department custody are stored by authorized Department staff in a secure office setting that is not open to the public.
- Discrimination (i.e., unfair or unethical differential treatment of individuals or denial of civil rights). Taxi cab drivers and riders may experience discrimination if the surveillance technology records their images based on their belonging to a specific group (e.g., based on color, race, or ethnicity).
  - technical measures make this impact unlikely because the technology is deployed equally on all taxi cabs regulated by the City
  - Administrative safeguards make this unlikely because Department staff will request videos from the taxi cab companies only under an authorized use case and not based on the Department's assessment of the video.
- Economic Loss (e.g., identify theft/misidentification). Taxi cab drivers and riders may experience economic loss if their identities are stolen through unauthorized access to data collected by the surveillance technology.
  - technical measures make this impact unlikely because the surveillance technology does not record personally identifiable information from taxi company drivers or riders that is typically used for identity theft (e.g., names, addresses, credit card numbers, social security numbers, etc.).
- Loss of Autonomy (e.g., loss of control over decisions on how personal information is used or processed). Taxi cab drivers and riders may experience loss of autonomy if video recordings of their likeness are used for purposes other than authorized use cases or made generally available to the public.
  - Administrative safeguards make this impact minimal because only designated Department staff have access to view video files, which occurs only under an authorized business case. SD cards are returned to the respective taxi cab company once Department review is complete, unless the video file becomes the subject of an appeal, an accident investigation or criminal investigation. Video files retained by the Department are generally not available to the public.
  - Physical protections make this impact minimal because SD cards while in Department custody are stored in the possession of authorized Department staff in a secure office setting that is not open to the public.
- Loss of Liberty (i.e., improper exposure to arrest or detainment due to incomplete or inaccurate data). Taxi cab drivers and riders may experience loss of liberty if law enforcement misidentifies them in connection with a crime recorded by the surveillance technology.
  - Administrative safeguards make this impact unlikely because law enforcement verify the identities of taxi cab drivers and riders using data from other sources (e.g., taxi cab company records and credit card transactions) before they take action.

- Physical Harm (e.g., physical harm or death). Taxi cab drivers and riders may experience physical if they are identified, tracked, and physically attacked based on data collected by the surveillance technology.
  - technical measures make this impact unlikely because the surveillance technology does not record personally identifiable information from taxi company drivers or riders that (other than law enforcement) could reasonably be used to identify individuals (e.g., names, addresses, credit card numbers, social security numbers, etc.).
  - Administrative safeguards make this impact minimal because only designated Department staff have access to view video files, which occurs only under an authorized business case. SD cards are returned to the respective taxi cab company once Department review is complete, unless the video file becomes the subject of an appeal, an accident investigation or criminal investigation. Video files retained by the Department are generally not available to the public.
  - Physical protections make this impact minimal because SD cards while in Department custody are stored by authorized Department staff in a secure office setting in a secure office setting that is not open to the public.
- Loss of Trust (e.g., breach of implicit or explicit expectations or agreements about the processing of data, or failure to meet subjects' expectation of privacy for information collected). Taxi cab drivers and riders may experience loss of autonomy if video recordings of their likeness are used for purposes other than authorized use cases or made generally available to the public.
  - Administrative safeguards make this impact minimal because only designated Department staff have access to view video files, which occurs only under an authorized business case. SD cards are returned to the respective taxi cab company once Department review is complete, unless the video file becomes the subject of an appeal, an accident investigation or criminal investigation. Video files retained by the Department are generally not available to the public.
  - Physical protections make this impact minimal because SD cards while in Department custody are stored by authorized Department staff in a secure office setting that is not open to the public.
- Overall
  - Administrative Safeguards: The Department provides access to video data received from the taxi cab companies and other taxi permittees only to authorized staff, as required to perform the use cases. All access to videos is password protected and each taxi cab company has a separate password.
  - Technical Safeguards: The Department does not have continuous or instant access to video data or information recorded by the technology. The Department must request video data or information for specific incidents after they occur and the taxi cab company provides video files on password secure digital (SD) cards.

- Physical Safeguards: Password protected secure digital (SD) cards are kept in the custody of only authorized Department staff.

C. Fiscal Analysis of Costs and Benefits

The Department's use of limited video data from Taxi Dashboard Cameras yields the following business and operations benefits:

- X Allows investigations to proceed: The Department is responsible for managing surface transportation in the City. The Department uses video data and information from the technology to ensure taxi cab companies and other taxi permittees and drivers comply with applicable requirements and conditions under Article 1100 (Regulation of Motor Vehicles to Hire) of Division II of the Transp. , which helps ensure consumer protection and, public health and safety.
- X Improved Data Quality: the alternative is conducting witness interviews after receiving a report or complaint. Having a recording of an incident helps to inform whether corrective action is warranted.
- X Time Savings: The alternative is relying solely on witness interviews, which can be time consuming and may not be reliable in some cases.

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

- Number of FTE (new & existing): 0. The Department does not own or have staff that support the use of the surveillance technology because it does not own this technology. Taxi cab companies and other taxi permittees and their drivers support the technology.
- The Department does not fund its use and maintenance of the surveillance technology. The taxi cab companies and other taxi permittees and their drivers pay for the surveillance technology.

**COMPARISON TO OTHER JURISDICTIONS**

Taxi Dashboard Cameras are currently utilized by other governmental entities for similar purposes.