Surveillance Impact Report

Social Media Monitoring Software
Multiple Departments within the City and County of San Francisco

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 Social Media Monitoring Software, (hereinafter referred to as "surveillance technology").

This Surveillance Impact Report applies to the use of social media monitoring software and technology by the following city and county departments:

- Airport
- Arts Commission
- Assessor – Recorder Office
- Asian Art Museum
- City Administrator's Office – 311
- City Administrator's Office – Animal Care & Control
- City Administrator's Office – Central Office
- City Administrator's Office – Office of Civic Engagement and Immigrant Affairs
- City Administrator's Office – Office of Transgender Initiatives
- City Planning Department
- Controller's Office
- Department of Building Inspection
- Department of Children, Youth, and their Families
- Department of Early Childhood
- Department of Emergency Management
- Department of Homelessness and Supportive Housing
- Department of Police Accountability
- Department of Public Health
- Department of Technology and SFGov/ SFGovTV
- Environment Department
- Ethics Commission
- Human Rights Commission
- Mayor's Office
- Municipal Transportation Agency
- Office of Economic and Workforce Development
- Port of San Francisco
- Public Utilities Commission
- Recreation and Park Department

DESCRIPTION OF THE TECHNOLOGY

The Departments use the surveillance technology to communicate with members of the public about departmental programs, services, and news.

The Departments shall use the surveillance technology only for the following authorized purposes:

Authorized Use(s):

− *Publish the Department's content on social media.*
− *Communicate with social media users about Department news and share information on services offered through various social media channels.*
− *Analyze data gathered from social media sources to optimize outreach to general public and achieve Department's communication objectives.*

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

This technology is a software which is used by city and county staff on city-issued devices to communicate with members of the public through the Internet.

Technology Details

This is a product description of the technology:

A social media monitoring technology is a technology from which a department can review all their social media accounts in one place, search all accounts and public content at once by typing in key words through a dashboard interface, schedule posts in advance on social media platforms and analyze the engagement with those posts. While the specific functions of each tool may vary, the technology often allows conversations to be labeled for later reference and can save content posted to social media platforms by other users. Search terms can be saved so that they can be repeated in the future, supporting customized monitoring across social media platforms.

Examples of social media monitoring technologies potentially used by the listed Departments include:

- AgoraPulse
- Archive Social
- Buffer
- Critical Mention
- Falcon/ Brandwatch
- Hootsuite
- Later.com

- Meltwater
- Meta Business Manager and Meta Business Suite
- Sendible
- Sprout Social
- Tweetdeck

This is a description of how the technology works:

To function, the surveillance technology is a social network manager that allows users to create custom views of all connected social networks. The technology can be used to post to multiple social media accounts, manage social media messaging, and coordinate the organization's social media marketing. The platform aggregates social media feeds so that content and trends can be viewed holistically.

Third-Party Vendor Access to Data

All data collected or processed by the surveillance technology will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by the third-party company which provides the social media monitoring software to ensure the Department may continue to use the technology.

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 the surveillance technology has the following benefits for the residents of the City and County of San Francisco:

Benefit	Description
Education	The technology allows the department to inform the public about city and county – provided programs, services, facilities and or benefits using social media services that the public already uses.
Community Development	The technology allows the department to communicate with San Francisco residents about city and county-provided programs, services, facilities, and/or benefits. It also allows the department to gather community feedback via social media engagement by residents with the department's social media accounts.

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:

- Discrimination: Although the information on social media websites is by default public and exists in the public sphere, there is documented evidence that shows that federal entities in the United States have used social media monitoring technologies to collect information about individuals or groups as part of investigations, sometimes without sufficient justification or oversight. These investigations can target certain ethnic groups or nationalities. If the technology is used in this way, it could lead to discriminatory outcomes.
- Loss of Liberty & Loss of Trust: Governments could misuse social media monitoring tools to identify and target individuals or groups expressing dissenting opinions or criticizing government policies. This could lead to unwarranted surveillance and a chilling effect on freedom of speech and expression. Additionally, this can erode trust in government.

The administrative safeguards are that the Departments will make sure that only authorized personnel have access to the surveillance technology. Access will be revoked if someone moves to a job without approved access.

The technical safeguards are that the surveillance technology access will be password protected, with passwords that comply with cybersecurity best practices. Departments will only use platforms that pass internal cybersecurity approvals. Authorized personnel will only access the technology from applications and devices approved for use by city and county cybersecurity standards.

C. Fiscal Analysis of Costs and Benefits

Surveillance Oversight Review Dates
PSAB Review: 06/08/2023; Recommended 06/08/2023
COIT Review: TBD (list all dates at COIT, and write "Recommended: MM/DD/202X" for rec date)
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The Department's use of the surveillance technology yields the following business and operations benefits:

Benefit	Description
Financial Savings	The social media monitoring software presents financial benefits by reducing the number of staff who need to work on the Department's social media work
Time Savings	The social monitoring software helps the Department save time by allowing social media management with fewer staff members than would be needed if the software was not being used.

Appendix A lists the fiscal cost, such as initial purchase, personnel and other ongoing costs, for the surveillance technologies used by each department.

COMPARISON TO OTHER JURISDICTIONS

The surveillance technology is currently utilized by other governmental entities for similar purposes. Other government entities have used the surveillance technology in the following way:

Social media monitoring technology has been used by many local, state and national government entities in the United States and internationally to engage their constituents and communicate effectively with them using social media platforms for engagement. Platforms such as Hootsuite and Meltwater report[1] that government entities and other organizations in the public sector use their services, such as Barcelona City Council, the government of British Colombia, the West Midlands Police Department, the city of Boston and the London Metropolitan Police Department.

While many government entities use these platforms to communicate quickly and effectively with constituents, social media monitoring technologies have also been used by law enforcement entities, such as the Department of Homeland Security, the Federal Bureau of Investigation, and the State Department, to gather information about social media users for

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[1] *See Hootsuite at* https://www.hootsuite.com/industries/government *and Meltwater at* https://www.meltwater.com/en/industry/public-sector).

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investigations[2]. These kinds of investigations can particularly impact immigrants to a country where they have not yet acquired citizenship[3].

The effectiveness of the surveillance technology while used by government entities is determined to be the following:

> Social media monitoring technologies allow for government entities to better understand social media trends, how people are communicating online about certain topics, and how they are interacting with certain accounts across the social media ecosystem. A social media monitoring technology assists its users with those goals.

> Social media monitoring tools also allow government entities to quickly share important announcements, news updates, and emergency information with their communities, across platforms. This real-time communication can be particularly effective in situations where immediate action or awareness is required. Moreover, the tools offer a more time-efficient way of reaching a large audience given one post can be placed across various social media platforms, reducing the time it takes to communicate with the public.

The adverse effects of the surveillance technology while it has been used by other government entities are:

Effect	Description
Civil Rights and/or Civil Liberties Abuse	Government entities can use the tools included in social media monitoring technologies to surveil communications and investigate people in spaces of communication. These tools make it easier to search for key words and to monitor trends in speech, which could make people not want to speak freely or organize protests that are lawful.

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[2] *See Brennan Center for Justice report at* https://www.brennancenter.org/our-work/research-reports/social-media-surveillance-us-government#:~:text=The%20Department%20of%20Homeland%20Security,to%20screening%20travelers%20and%20immigrants.).

[3] *See ACLU report at* https://www.aclu.org/news/national-security/is-the-government-tracking-your-social-media-activity

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Appendix A: Financial Information per Department

The table below provides an estimate of the fiscal costs of the Surveillance Technology, including initial purchase, personnel cost to operate and maintain the technology, and any other ongoing costs such as annual subscriptions. All costs below are annual. There are no one-time costs identified.

<u>**Total Annual Cost Estimate per Department**</u>

Department	**Personnel** Cost ($)	**Software** Cost ($)	Total Annual Cost ($)
Airport	72,000	60,000	132,000
Arts Commission	74,681	14,137	88,818
Asian Art Museum	50,000	-	50,000
Assessor – Recorder Office	5,127	-	5,127
City Administrator's Office – 311	526,507	4,050	530,557
City Administrator's Office – Animal Care & Control	2,370	-	2,370
City Administrator's Office – Central Office	1,982	3,450	5,432
City Administrator's Office – Office of Civic Engagement and Immigrant Affairs	17,931	60	17,991
City Administrator's Office – Office of Transgender Initiatives	78,310	-	78,310
City Planning Department	20,018	-	20,018
Controller's Office	4,518	-	4,518
Department of Building Inspection	-	-	-
Department of Children Youth and Families	149,227	-	149,227
Department of Early Childhood	3,731	-	3,731
Department of Emergency Management	-	-	-
Department of Homelessness and Supportive Housing	29,452	-	29,452
Department of Police Accountability	693	-	693
Department of Public Health	57,585	-	57,585
Department of Technology and SFGov/ SFGovTV	43,501	9,300	52,801
Environment Department	84,517	3,210	87,727
Ethics Commission	12,498	-	12,498

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Human Rights Commission	44,253	-	44,253
Mayor's Office	51,477	-	51,477
Municipal Transportation Agency	132,229	45,480	177,709
Office of Economic and Workforce Development	42,343	-	42,343
Port of San Francisco	62,750	1,788	64,538
Public Utilities Commission	85,518	17,268	102,786
Recreation and Parks	33,702	6,000	39,702
Grand Total	1,690,087	164,743	1,854,830

Funding Source: These costs are supported by Self-Supporting funds and the General Fund.

Department Personnel: The list below provides the specific personnel titles included in the personnel cost represented in the table above.

Department Personnel Included in Cost Estimate

Airport

941, 931, 923	Managers
9254	Web Master
1312	Social Media Specialist
0932 & 0922	Customer Service Managers
	Wag Brigade staff
	Airport Museum Staff

Arts Commission

1312	Public Information Officer
1314	Public Relations Officer
1840	Junior Management Assistant
1842	Management Assistant

Asian Art Museum

	AAM Foundation Position

Assessor – Recorder Office

1070	IT Director

City Administrator's Office – 311

1324	Customer Service Agent
1326	Customer Service Supervisors
933	Deputy Director or Call Center Manager
1822	Administrative Analyst
1053	Senior Business Analyst

City Administrator's Office – Animal Care & Control

1310	Public Relations Assistant

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City Administrator's Office – Central Office
1822	Administrative Analyst
1823	Senior Administrative Analyst
9251	Public Relations Manager

City Administrator's Office – Office of Civic Engagement and Immigrant Affairs
1844	Senior Communications Specialist

City Administrator's Office – Office of Transgender Initiatives
932	Manager IV
1842	Management Assistant

**City Planning
Department**
1827	Administrative Services Manager

Controller's Office
922	Communications & Engagement Manager

Department of Building Inspection
1452	Executive Secretary II

Department of Children Youth and Families
9774	Senior Community Development Specialist

Department of Early Childhood
9774	Senior Community Development Specialist

Department of Emergency Management
900	Manager Series
8604	Emergency Services Coordinator IV
8603	Emergency Services Coordinator III
8602	Emergency Services Coordinator II

Department of Homelessness and Supportive Housing
1312	Public Information Officer
1824	Principal Administrative Analyst
953	Deputy Director III

Department of Police Accountability
1052	IS Business Analyst
923	Manager II

Department of Public Health
1312	Public Information Officer

Department of Technology and SFGov/ SFGovTV
1767	Media Programming Specialist

Environment Department
5638	Environmental Assistant

Ethics Commission
1230	Instructional Designer
1823	Senior Administrative Analyst

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	1824	Principal Administrative Analyst

Human Rights Commission

	1312	Public Information Officer
	2991	Coordinator, Human Rights Commission
	923	Manager II

Mayor's Office

	886	Mayoral Staff VI

Municipal Transportation Agency

	9172	Manager II, MTA
	9177	Manager III, MTA
	1822	Administrative Analyst
	1314	Public Relations Officer
	1312	Public Information Officer
	1310	Public Relations Assistant
	1052	IS Business Analyst

Office of Economic and Workforce Development

	1823	Senior Administrative Analyst
	1823	Senior Administrative Analyst
	9910	Public Service Assistant

Port of San Francisco

	1312	Public Information Officer

Public Utilities Commission

	1312	Public Information Officer
	9252	Communications Specialist

Recreation and Parks

	3374	Volunteer/ Outreach Coordinator

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