



# Surveillance Impact Report

SCRAM GPS

Juvenile Probation Department

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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 SCRAM GPS Ankle Monitor Bracelet.

## DESCRIPTION OF THE TECHNOLOGY

The Department's mission is to serve the needs of youth and families who are brought to our attention with care and compassion; to identify and respond to the individual risks and needs presented by each youth; to engage fiscally sound and culturally competent strategies that promote the best interests of the youth; to provide victims with opportunities for restoration; to identify and utilize the least restrictive interventions and placements that do not compromise public safety; to hold youth accountable for their actions while providing them with opportunities and assisting them to develop new skills and competencies; and contribute to the overall quality of life for the citizens of San Francisco within the sound framework of public safety as outlined in the Welfare & Institutions Code.

In line with its mission, the Department uses SCRAM GPS Ankle Monitor Bracelet to:

Electronic monitoring, as ordered by the Court, is used as an alternative to detention or as a measure of stepped up supervision for youth on probation, supporting the Department's mission to respond to individual risks and needs, engage in fiscally sound strategies that promote the best interest of youth, support victims, and to utilize the least restrictive interventions and placements that do not compromise public safety, and contribute to the quality of life of the citizens of San Francisco.

The Department shall use SCRAM GPS Ankle Monitor Bracelet only for the following authorized purposes:

- Youth are only placed on electronic monitoring in San Francisco with a court order. The Court may order a youth to be placed on electronic monitoring as an alternative to detention.
- Electronic monitoring (EM) may also be added as a condition of probation if additional supervision is warranted. EM data is analyzed on a daily basis by probation officers to ensure compliance with:
  - Court ordered curfews
  - Inclusion zones: addresses/areas where the minor has approval to be present, for example their home, school, work.
  - Exclusion zones: addresses/areas where the minor should not be present, including Stay Away orders
  - Schedules: To monitor school attendance, program participation, work.

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## Surveillance Oversight Review Dates

COIT Review: November 18, 2021

Board of Supervisors Review: TBD

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

Department technology is located in San Francisco and the Bay Area.

### **Technology Details**

The following is a product description of SCRAM GPS Ankle Monitor Bracelet:

Continuously signaling, or "active" Electronic Monitoring systems have three essential parts: a transmitter, a receiver/dialer and a central computer. The transmitter is strapped to the participant and broadcasts a coded signal over a telephone line at regular intervals. The receiver/dialer picks up signals from the participant's transmitter and reports to a central computer when the signals stop and start. The computer compares any signal interruptions with the participant's curfew schedule (inconsistent, pre-determined movement or geographical locations) and alerts correctional officials to unauthorized absences.

#### A. How It Works

To function, SCRAM GPS Ankle Monitor Bracelet consists of placing FCC-certified ankle bracelets on participants that monitor location through global positioning system (GPS) technology. The bracelets are placed in such a way that they cannot be removed. At least once per minute, 24 hours per day, 7 days per week, the bracelet transmits location information via the cellular network to a central computer. The information is compared with the court ordered curfew schedule and/or inclusion/exclusions zones. SCRAM provides a web-based interface for JPD to access the monitoring data.

All data collected or processed by SCRAM GPS Ankle Monitor Bracelet will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by SCRAM of California 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 SCRAM GPS Ankle Monitor Bracelet has the following benefits for the residents of the City and County of San Francisco:

- Criminal Justice, Public Safety: Electronic monitoring enables the Court to utilize the least restrictive intervention to respond to juvenile delinquency and promote public safety. This technology benefits residents by safely reducing the detention of youth in juvenile hall and advancing community safety.

#### 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:

- **Risks and Mitigation**: The Department has considered the potential civil rights/liberties impacts associated with the surveillance technology and has identified administrative, technical, and physical safeguards to mitigate these impacts through responsible technology and data use policies and procedures. JPD utilizes SCRAM electronic monitoring only as ordered by the Court for authorized use cases. All other uses are expressly prohibited.
- **Administrative Safeguards**: All sworn Probation Services Personnel are provided training by SCRAM on how to install, removed, activate, and deactivate, an Electronic Monitor, as well as being able to navigate the SCRAM web-based interface prior to using the system prior to accessing or using the technology. The Director of Probation Services or designee will be responsible for enforcing the Surveillance Technology policy through its incorporation into the overall Department Policy for Probation Services. All sworn Probation Services personnel will be trained on the Surveillance Technology policy. Violation of the policy will be subject to standard JPD departmental policies, which may include disciplinary action up to and including termination.
- **Technical Safeguards**: TLS for transmission, encrypted at rest; security measures that allow only authorized personnel to access.
- **Physical Safeguards**: Hardware is stored in locked office.

#### C. Fiscal Analysis of Costs and Benefits

The Department's use of SCRAM GPS Ankle Monitor Bracelet yields the following business and operations benefits:

- Improved Data Quality, Time Savings: Electronic monitoring benefits department operations by providing alternatives to detention pursuant to the order of the Court in a manner that is responsive to individual risks and needs, and by engaging in fiscally sound strategies that promote the best interest of youth, support victims, utilize the least restrictive interventions and placements that do not compromise public safety, and contribute to the quality of life of the citizens of San Francisco.

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

- Number of FTE (new & existing): Technical support is provided by SCRAM.
- The annual costs are:
  - Total Salary & Fringe: 0
  - Software: 0
  - Hardware/ Equipment: 0
  - Professional Services: \$84,489.84
  - Training: 0
  - Other: 0

The Department funds its use and maintenance of the surveillance technology through Juvenile justice apportionments from the state are the source of funding for the technology.

### **COMPARISON TO OTHER JURISDICTIONS**

SCRAM GPS Ankle Monitor Bracelets are currently utilized by other governmental entities for similar purposes.