



# Surveillance Impact Report

Spotery - web application used for tennis reservations  
Recreation and Parks 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 Spotery - web application used for tennis reservations.

## DESCRIPTION OF THE TECHNOLOGY

The Department's mission is to provide enriching recreational activities, maintain beautiful parks and preserve the environment for the well-being of our diverse community.

In line with its mission, the Department uses Spotery to allow for equitable access to our recreational sites.

The Department shall use Spotery only for the following authorized purposes:

- To confirm that the person who reserved the booking for a tennis court is at the location at the reserved time
- To utilize data to determine if there are any reservation holders who are violating booking policies because they are not showing up at the reserved time. Data can be accessed on the web application or as a report delivered by Spotery.

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

Department technology is located as an app through Spotery. The reservation holder can use the check in button (sent by the reservation system) within 15 minutes before or after the reservation time. Spotery checks the location of the reservation holder to ensure that they are within 0.1 miles of the tennis court reserved. If not, the check in process cannot be completed.

## Technology Details

The following is a product description of Spotery:

Spotery's core business is a marketplace for facility rentals. San Francisco Recreation & Park Department (SFRPD) Permits & Reservations worked with Spotery to custom build a reservation platform for tennis courts so that these could be fairly allocated (please see: <https://www.spotery.com/>).

### A. How It Works

To function, Spotery works as reservation holder to allow a person to book a tennis court up to seven days in advance.

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## Surveillance Oversight Review Dates

COIT Review: June 16, 2022

Board of Supervisors Review: TBD

24 hours prior to the reservation, a reminder email is sent to the reservation holder. The reminder email contains a check-in button. The reservation holder can use the check in button within 15 minutes before or after the reservation time.

Spotery checks the location of the reservation holder to ensure that they are within .1 miles of the tennis court. Spotery needs access to the reservation holder's location so "Enable Location Services" must be turned on.

All data processed by Spotery will be handled by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by Social Solutions 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 Spotery has the following benefits for the residents of the City and County of San Francisco:

X Health - Residents are able to book reservations for tennis courts which allow for recreational and physical activity.

### **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:

- The San Francisco Recreation and Park Department strives to mitigate all potential civil rights impacts through responsible technology and associated data use policies and procedures. The Department intends to use the Spotery GPS check in and associated data exclusively for the authorized uses cases. All other uses, including surveillance of San Francisco residents or groups, are expressly prohibited.

The administrative, technical and physical safeguards are described below.

- Administrative Safeguards: Only the Chief Information Officer (0941) and the Director of Property, Permits and Reservation (0953) or designee - Administrative Analysts (1820 series) will have logins to the Spotery web app to access the data.
- Technical Safeguards: Only the Chief Information Officer (0941) and the Director of Property, Permits and Reservation (0953) or designee - Administrative Analysts (1820 series) will have logins to the Spotery web app to access the data. Data is encrypted and sent via SSL.
- Physical Safeguards: Data is securely stored by Spotery in the cloud.

### C. Fiscal Analysis of Costs and Benefits

The Department's use of Spotery yields the following business and operations benefits:

X Time Savings, Staff do not need to review and research anecdotal evidence about reservation holders not utilizing the court for the reserved time.

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

- Number of FTE (new & existing): 1 FTE - Senior Administrative Analyst (1823) - 25%
- The annual costs are:
  - Total Salary & Fringe: \$42k Based on: 1823 Salary (127k) \* Fringe (.33) \* % Time Spent (.25)
  - Software: \$15k for all functionality offered by Spotery (include the GPS Check in feature)
  - Hardware/ Equipment: 0
  - Professional Services: 0
  - Training: 0
  - Other: 0

The Department funds its use and maintenance of the surveillance technology through operational funds.

### **COMPARISON TO OTHER JURISDICTIONS**

Spotery is currently utilized by other governmental entities for similar purposes.