



Surveillance Impact Report

Social Media Monitoring Software
Fire Department

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”).

DESCRIPTION OF THE TECHNOLOGY

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

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

Authorized Use(s):

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| <i>– Publish the Department’s content on social media.</i> |
| <i>– Communicate with social media users about Department news and share information on services offered through various social media channels.</i> |
| <i>– Analyze data gathered from social media sources to optimize outreach to general public and achieve Department’s communication objectives.</i> |
| <i>– Respond to social media users’ posts about possible emergencies, fire code violations, and other situations in the purview of the Fire Department.</i> |

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

Surveillance Oversight Review Dates

PSAB Review: 8/24/2023

COIT Review: TBD

Board of Supervisors Approval: TBD

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 Department 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.
Public Safety	The technology allows the department to quickly respond to questions/problems raised by residents in multiple public forums.

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 Department 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

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.

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

Number of Budgeted FTE (new & existing) & Classification	H039 - Fire Captain - Public Information Officer (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$6,995	0
Software	3,450.00	0
Hardware/Equipment	0	0
Professional Services	0	0
Training	0	0
Other	0	0
Total Cost	\$3450.00	None

The Department funds its use and maintenance of the surveillance technology through the **General Fund**.

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 report¹ that government entities and other organizations in the public sector use their services, such as Barcelona City Council, the government of British Columbia, 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 investigations². These kinds of investigations can particularly impact immigrants to a country where they have not yet acquired citizenship³.

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

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

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>

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.